

**Application of Pennsylvania-American Water Company for the Acquisition
of the Wastewater Collection and Treatment System Owned by the York City Sewer
Authority (the “Authority”) and Operated by the City of York (the “City”)
(collectively “York”)**

**66 Pa. C.S. § 1329
Application Filing Checklist – Water/Wastewater
Docket No. A-2021-3024681**

20. Proof of Compliance. Provide proof of compliance with applicable design, construction and operation standards of DEP or of the county health department, or both, including:
- f. Provide documentation of all Notices of Violation issued to seller by DEP for the last 5 years, an explanation of each, including a description of any corrective or compliance measures taken.

RESPONSE:

- f. Please see document of Notice of Violations issued to seller by DEP and Notice of Violations and Opportunity to Confer NPDES Permit #PA0026263 issued by the United States Department of Environmental Protection attached as **Appendix A-20-f**. See also, **Schedule 4.14** for a listing of Notice of Violations.



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
CLEAN WATER PROGRAM

August 13, 2012

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7007 3020 0002 8376 4924

James E. Gross, Director
Department of Public Works
101 South George Street
PO Box 509
York, PA 17405

Re: Sewage
York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Gross:

This is to confirm the results of the Department's inspection conducted on August 9, 2012, which revealed the following violations:

1. The unauthorized discharge of partially treated sewage from the York City WWTP that occurred on August 7, 2012. The discharge was the result of the loss of electrical power to the ultra-violet disinfection system.
2. Several operational issues at the York City WWTP that occurred on August 6, 2012, including a malfunction of the recirculation pumps in Train 3, loss of electrical power to Train 2 effluent screw pumps and sand filter system, and the improper operation of the centrifuge system.

Such conditions are in violation of your permit No. PA0026263. Consequently, you are in violation of the Pennsylvania Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended, and subject to the penalties provided therein.

At this time the Department is requesting that you contact me within 5 days of the date of this letter to schedule a meeting to discuss these violations and recent personnel changes at the facility.

Mr. James E. Gross

- 2 -

August 13, 2012

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection (Department). It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

To schedule the requested meeting, please contact me 717.705.4789.

Sincerely,

A handwritten signature in black ink that reads "Victor Landis". The signature is written in a cursive style with a large, looped initial "V".

Victor Landis
Water Quality Specialist Supervisor
Clean Water Program

cc: York City WWTP



December 9, 2015

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7009 2820 0000 5820 4931

Mr. James Gross
York City STP
345 East Market Street
York, PA 17403

Re: Sewage Sludge Discharge
York City STP
NPDES Permit No. PA 0026263
Manchester Township, York County

Dear Mr. Gross:

This is to confirm the results of the Pennsylvania Department of Environmental Protection's (Department) inspection of this facility on October 30, 2015, which revealed an unauthorized discharge of sewage sludge to a storm drain, a waterway of the Commonwealth, and a malfunction of onsite centrifuge equipment.

Such a discharge of sewage product, to waterways of the Commonwealth, without a permit, is a violation of Sections 201 and 202 of the Pennsylvania Clean Streams Law, 35 P.S. §§ 691.201 and 691.202.

Such a malfunction of centrifuge equipment is an operations and maintenance violation of NPDES Permit PA 0026263.

The Department is in receipt of your initial written report of the discharge incident received 10/29/2015 and the written report received on 10/30/2015 regarding cleanup performed. In addition to these reports, the Department is requesting a follow up report indicating the date of completion for the correction of the malfunctioning centrifuge equipment. Please also include any additional preventive measures you are planning to prevent future discharges of this nature along with a corresponding implementation schedule.

We ask that you submit this report to the Department by 1/15/2016.

York City STP

- 2 -

December 9, 2015

Additionally, the Department would like to remind you that immediate notification to this office, in conjunction with containment and cleanup, is required by the Department's regulations in the event of an incident that causes or has the potential to cause such a discharge.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection (Department). It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.771.4466. Thank you.

Sincerely,



Austin N. Pardoe
Water Quality Specialist
Clean Water Program

Enclosure: Copy of inspection report from 10/30/2015

cc: Hidalgo Diaz, York City STP Operator: HDiaz@yorkcity.org

Y-3-A
York City STP
PA0026263



The City of York Pennsylvania

101 South George Street ❖ PO Box 509 ❖ York PA 17405

www.yorkcity.org

Honorable C. Kim Bracey, Mayor

James E Gross
Director
Department of Public Works

January 14, 2016

Austin N. Pardoe
Water Quality Specialist
Clean Water Program
PA DEP
150 Roosevelt Avenue
York, PA 17401-3381

Re: Sewage Sludge Discharge
York City STP
NPDES Permit No. PA 0026263
Manchester Township, York County



withnabage@amwater.com
161.69.122.15

Dear Mr. Pardoe:

This letter is in response to the Notice of Violation letter issued by DEP, dated December 9, 2015. The City of York's response to the letter is as follows:

Repair of Centrifuge Equipment

Repairs to the screw in the conveyor system have been completed this morning. It will be tested this afternoon. If everything tests ok, the City should be processing sludge this afternoon with Centrifuge 1. The Centrifuge 2 VFD is hooked up and ready for startup. The electrical contractor, I.B. Abel, confirmed that a representative will be onsite tomorrow morning (January 15, 2016) to test the drive. If no problems arise, Centrifuge 2 should be ready tomorrow, hopefully before noon.

The sludge inventory in T20/T21 is 7.5' and 19.7' (24' max. each). There is also 12.7', 28.1' and 27.3' respectively on Digesters 1 to 3 (30' max. each). Therefore, there is still adequate storage capacity for sludge until everything is back to normal. After tomorrow, the sludge in T21 could be lowered by about 3' to 4' per shift, so everything should be caught up in about two weeks (roughly by the end of January).

Centrifuge Spill Preventive Measures

- The Spill Response SOP was reviewed with all Plant Operators.
- Spill blockers were placed along the west garage door, where the centrifuges are located and adjacent to the drain.
- A rubber floor pad is on hand to be placed over the drain in case of a future similar event with the centrifuges. Sand bags will be used in conjunction with the floor pad to obtain a tight seal around the perimeter.

The centrifuge area monitoring and spill blockers were implemented about two months ago. A formal training on the use of the floor mat for the drain is going to be given to operators next week. Should anything happen to reach the drain area, these measures will allow sufficient time to remove any sludge with a vacuum truck and prevent it from reaching the water body.

Ostara Process

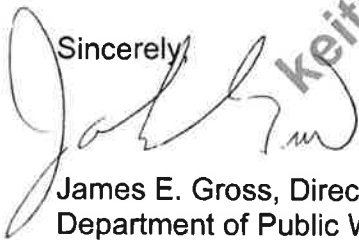
- Ostara assigned an additional individual to evaluate and make corrections at the York Facility.
- Ostara halted the drying operations until the fine material was removed from the reactors.
- Ostara scheduled a vacuum truck to clean out the sump and fine material from the reactors.
- The reactor cleaning allowed the system to be reset and restarted.
- The drier and sieving unit was cleaned and is now working efficiently.
- Ostara conducts biweekly telecommunication meetings to discuss operations of the Ostara system.
- Ostara is evaluating the acid addition system for recommendations and modifications.

- The City stressed the importance of preventing the release of fines/particulates from the facility. Ostara was informed of the PaDEP inspection on 10/30/2015 and that the DEP inspector indicated that he would notify the Air Quality inspector of the matter.
- York WWTP staff are to continue to copy/inform Ostara of any issues related to the operations of the York facility. Contacts to notify are: Mark Silvanovich msilvanovich@ostara.com and Ryan deBerry rdeberry@ostara.com

The Ostara system has been working without any issues through the end of 2015 and as of the date of this letter.

We trust you will find the above measures to be in accordance with the requirements of the Department. Should you have any questions or require additional information, please contact our office at (717) 849-2302 or Mr. Paul E. Gross, P.E. of Buchart Horn, Inc. at (717) 852-1366, at your convenience.

Sincerely,



James E. Gross, Director
Department of Public Works



March 23, 2016

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7009 2820 0000 5819 5741

Mr. James Gross
York City STP
345 East Market Street
York, PA 17403

Re: Sewage Discharge
York City STP
NPDES Permit No. PA 0026263
Manchester Township, York County

Dear Mr. Gross:

This is to confirm the results of the Pennsylvania Department of Environmental Protection's (Department) inspection of this facility on February 25, 2016, which revealed a plant overflow, which led to unauthorized discharges of sewage to onsite storm drains and the Codorus Creek, which are waterways of the Commonwealth.

Such discharges of sewage, to waterways of the Commonwealth, without a permit, are violations of Sections 201 and 202 of the Pennsylvania Clean Streams Law, 35 P.S. §§ 691.201 and 691.202.

In response to these violations, I am requesting that you submit a full report of your own independent investigation, to include the circumstances leading to the incident, the details of the incident itself, and the measures taken to alleviate the problem, with associated dates and times. Any additional preventive measures you are planning should be outlined with an implementation schedule.

We ask that you submit this report to the Department by **4/22/2016**

Immediate notification to this office, in conjunction with containment and cleanup, is required by the Department's regulations in the event of an incident that causes or has the potential to cause such a discharge.

York City STP

- 2 -

March 23, 2016

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.771.4466. Thank you.

Sincerely,



Austin N. Pardoe
Water Quality Specialist
Clean Water Program

Enclosure: Copy of inspection report from 2/25/2016.

cc: Hidalgo Diaz, York City STP Operator: HDiaz@yorkcity.org

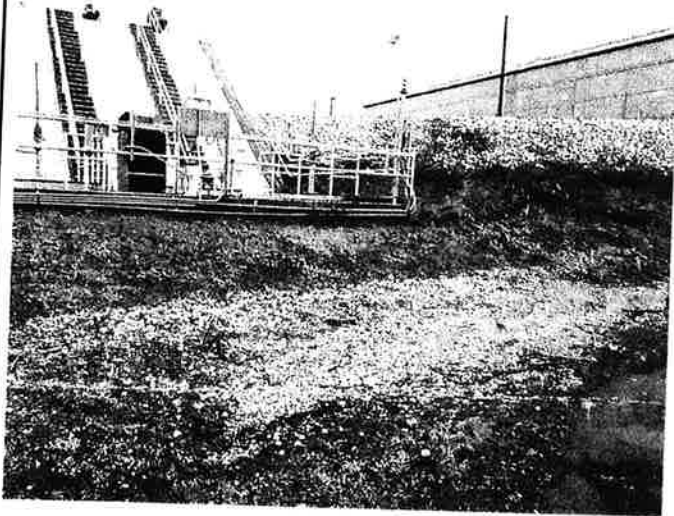


SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026263	Mo/Day/Year 2/25/2016	Entry Time ~10:20	Exit Time n/a	Inspection Type INCDT	eFACTS Inspection ID
Facility Name: York City STP			Permittee Name: York City Sewer Authority C/O Stacey R. MacNeal Katherman, Heim, & Perry		
Physical Location/Directions: 1701 Black Bridge Road, York, PA 17402				Permit Expiration Date: 1/31/2013	
Municipality: Springettsbury Township		County: York County		Permit Renewal Application Due: In Renewal	
Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor		Treatment Process: <input checked="" type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon <input type="checkbox"/> Other:			
Design Flow: MGD					
Responsible Official: Ms. Stacey R. Mac Neal		Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Title: Recording Secretary		Operator Name: Hidalgo Diaz			
Permittee 345 E. Market St.		Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Address: York, PA 17403		Client ID: 309032		License Expiration Date:	
Business Phone: 717-850-3708		Class-Subclass(es): A 1			
Cell Phone:		Operator properly certified for treatment process type: <input type="checkbox"/> Yes <input type="checkbox"/> No			
Email:		Business Phone: 717-845-2794 Plant			
		Cell Phone:			
		Email: HDiaz@yorkcity.org			
24-Hour Emergency Contact Person / Phone / Email: 717-845-2794 Plant					
VIOLATIONS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Sample Results					
-unauthorized discharge due to plant overflow.					
Recommendations:					
Person Interviewed:		Date:		Inspector:	
				Austin N. Pardoe	
Signature:		Phone No.:		Inspector Signature:	
Will send copy of report.					
Title:				Title: WQS	
Email:				Email: apardoe@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/or review of Department records.					

SEWAGE COMPLIANCE INSPECTION REPORT

Photographs



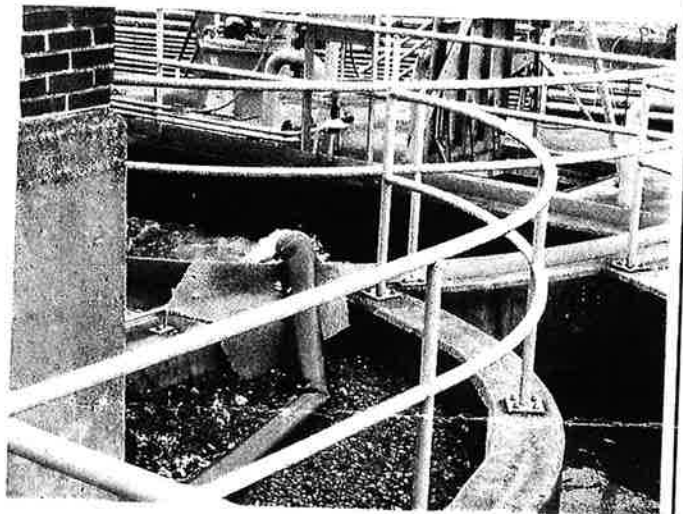
Grease balls on ground adjacent to T2 Clarifier.
Photo taken by Austin Pardoe on 2/25/2016.



Sewage remnants on top of stormdrain.
Photo taken by Austin Pardoe on 2/25/2016.



Solids on the ground adjacent to T2 clarifier.
Photo taken by Austin Pardoe on 2/25/2016.



Water getting pumped to primary clarifiers' effluent
pit from 001 stormwater tank.
Photo taken by Austin Pardoe on 2/25/2016.



The City of York Pennsylvania

101 South George Street □ PO Box 509 □ York PA 17405
www.yorkcity.org

Honorable C. Kim Bracey, Mayor

*James E Gross
Director
Department of Public Works*

April 18, 2016

Austin N. Pardoe
Water Quality Specialist
Clean Water Program
PA DEP
150 Roosevelt Avenue, Suite 200
York, PA 17401-3381

Circumstances leading to the problem

On February 24, 2016 at around 1820 hours we had a severe thunderstorm at the York City WWTP which brought us electrical problems in the main switchgear and substation 4 and 5 and as a result, we were left in an electrical blackout.

Incident details

The main switchgear that feeds the entire plant has dual utility power feeds. (Smith St. and Pleasureville). Since there had been a recent investigation into suspected power quality issues with the Smith Street (normal) line, the plant was temporarily operating from the Pleasureville (emergency backup) line. At one point during the incident, the Pleasureville line lost power. The Smith Street line was still available but since the switchgear was in manual operation mode it did not / could not automatically seek out the remaining source. This happened around 1820 hours.

Because of this we had no power from either source for a period of time. Plant operations had to call an electrical contractor to assist in restoring power. They arrived and were able to restore power to the switchgear from the Smith Street side at about 2030 hours. Once we had power in our main switchgear, we found out that two of our substations (4 and 5), also had power distribution problems. Substations 4 and 5 had both feed side breakers tripped which made power inaccessible to essential pumps (Raw Sewage and Primary Effluent pumps). The breakers were reset and we had the power restored at about 2045 hours. At this time, all Plant equipment was being turned on to try to get a handle on the high flow.

Train 2 is located in a low area and the lack of power caused us to have an overflow in this area. The last registered flow to the STP was about 28mgd but during the blackout it increased to nearly 51mgd. Since we could not pump any water out from this low area the overflow took place. We had three areas overflowing:

1. The 3 Train 2 Final clarifiers
2. The mixed liquor channel (BNR effluent)
3. The Primary Effluent wet well

The first two started to overflow at around 2000 hours. It was a mixture of secondary effluent from the final clarifiers and mixed liquor from the BNR effluent channel. The primary effluent wet well started to overflow shortly afterwards. This was mainly raw sewage, some primary effluent and a little mixed liquor. Since we were not getting water out of Train 2 through the effluent screw pumps, the overflow water started to gain way to the two splitter boxes in the secondary clarifiers, which lead to the storm water basin. The other part of the flood was around the primary effluent building, which was flooding the basement and some of the water was going through storm drains nearby to the storm water basin as well.

When we got the power restored and started to turn equipment online, we had to turn the Storm Water pumps on to draw the water level low around the primary effluent pump building and avoid further flooding the basement to keep our motors dry. The flooding did not start until about 2000 hours and was over at around 2200 hours. Due to the circumstances we had to turn on our storm water pumps to avoid imminent flooding, and the first rush of water was not chlorinated. Sodium Hypochlorite addition began shortly after the pumps were turned on. Pumping runtime was from 2045 hours to 2106 hours and it is estimated that around 0.45mgd of the initial storm water in the basin, mixed with the overflow from the three afore mentioned sources, was discharged from Outfall 001.

Measures taken to alleviate the problem

- We filled five primary and one secondary clarifiers to delay the flood but it was too much water to contain using Train 2 only. This was done around 1845 hours on Feb 24, 2016.
- Sodium Hypochlorite was dosed to the storm water discharge through the 001 effluent. Approximately from 2050 hours to 2120 hours on Feb 24, 2016.
- At about 1940 hours, we requested Springettsbury Township to cease sending us flow since we had no way of treating it.
- Storm water sequence disabled around 2200 hours on Feb 24, 2016 to contain contaminated water in the basin until cleanup was performed.
- Storm water basin cleanup was completed on March 18, 2016.

Additional preventive measures planned outlined & implementation schedule.

The City of York has contracted Buchart Horn to further study the Black Plant operation at the York City WWTP. A report prepared by Buchart Horn is attached. Work will continue on the Black Operation in 2016. The City of York can provide updates to PA DEP as this work progresses.

Buchart Horn's report follows:

Buchart Horn, Inc. has been asked to address the overall state of the York City Sewage Treatment plant's electrical distribution system, outline various problems, and recommend solutions. Evaluations of equipment conditions have been recently submitted for the authority's consideration and replacements have been bid but halted due to financial constraints. This report / letter is intended to provide an overview and recommendations along with some history of the black plant start issue and how it interrelates to the system's operation as a whole.

BLACK PLANT START:

Electrical Service History

This facility has been historically fed from two separate electrical services, a main and an emergency primary service, emanating from two separate utility owned substations. This arrangement provides a high level of availability for electric power needed to keep the plants processes online. MET ED, a First Energy Company, provides these primary metered services at 13,200 Volts. The primary service named "Smith Street" is very reliable and stable. It is for this reason, that the plant is normally connected to this line. The emergency service, named Pleasureville, after the location of the utility substation that it is derived from, has less overall capacity than Smith Street. The authority pays a utility fee to have the capacity to operate the entire plant from the Pleasureville service. This reserve capacity was negotiated with the utility and the utility maintains the reserve capacity by not allowing other customers to load the line above the level that the York City Sewer Plant needs to operate.

As mentioned above, this dual service arrangement from Met-Ed provides the plant with a high level of availability because the reliability of one service does not expose the plant to extended outages. In fact, based on the memory of Buchart Horn's experience at this facility during the past 45 years, the plant has only ever experienced 3 dual outages: One during Hurricane Agnes in 1972, the next time was during a switching anomaly in 2013 and most recently on Wednesday, February 24th 2016 as a result of a storm that produced tornadic winds in a neighboring county.

Co-Generation History

In the past, the facility had an additional source of electrical power. This came in the form of its onsite digester gas co-generation facility which consisted of three parallel reciprocating engine natural gas generators. These generators were designed to use a mixture of digester gas and natural gas to "push" power onto the plant's electrical distribution system. They were connected to the distribution system through Substation #3 on the 480 Volt side. The energy they produced was available throughout the plant by feeding the substation transformers "backwards" through Substation #3 and out to the 13,200 Volt plant wide distribution.

While operating in parallel with the utility, this system served to reduce the facility's electrical energy consumption and reduce its demand set point further reducing the utility charges. These units were able to operate the plant in a diminished capacity in the unlikely event of a dual service outage, but their primary purpose was energy savings using process byproducts. These units were originally commissioned in 1985 and served the facility well beyond their designed lifespan. When maintenance and reliability of the units began to make them more expensive to operate, they were slated for de-commissioning while a new technology was planned to replace them.

Implementing micro-turbines:

In 2011, the "old" co-generation system was replaced by micro-turbine technology. Micro-turbine generators use high speed turbines as their energy conversion medium. They burn natural gas and conditioned digester gas in much the same way a jet engine does to make mechanical energy that drives an alternator to make electrical power. The alternator is direct coupled to the shaft that spins at nearly 100,000 RPM. This produces a very high synchronous electrical frequency, 200 Hertz, which cannot be directly connected to the power grid which operates at 60 Hertz. The micro-turbine uses power electronics to convert this high frequency to a lower frequency that can be used by the rest of the plant's electrical apparatus.

It is these power electronics that require the plant to be operated differently when starting the electrical system during times that both utility services are lost. This operation is referred to as a "black plant start". Since the plant uses large substation transformers to distribute power from either the utility or from the co-generation system, the inrush of the transformers must be overcome. Inrush is the initial "surge" of electrical energy required by a transformer when it is first energized or switched on. This surge can be between 8 and 12 times

Appendix A-20-f

the amount of electrical current (amps) that a transformer operates at normally. Reciprocating engine generators were easily able to provide a large transformer's required inrush current because the wires from the alternator were connected through circuit breakers directly to the intended grid. Also, the alternator and its large magnetic field coupled to the engine inherently and provided the huge amount of stored energy required to feed many parallel transformers. This was the case with the old co-generation system.

Since the micro-turbine technology uses power electronics to transmit the electrical energy to the local grid, energizing the transformers requires a different strategy. The power electronics cannot be built to transmit up to 12 times more current than their nominal rating and if this is attempted they protect themselves and trip offline. According to the manufactures of these systems, the only way to energize a bank of transformers is to bring them up to full voltage and full frequency slowly via a process called ramping.

New Black Plant Start Strategy:

In order to ramp the transformers online gradually and in a controlled fashion, the facility loads should be disconnected from the grid during the ramp process. Exposing the process equipment to low frequency and low voltage during the ramp period will cause widespread damage to motor control systems, computer infrastructure and even lighting equipment. There is an acceptable range of frequency and voltage that the National Electrical Manufacturing Association (NEMA) sets as a standard to which manufacturers build equipment to withstand. The ramping process is well out of this range and therefore cannot be applied to the plant equipment during a black start.

In order to apply the ramping method with the plant loads disconnected, the main and tie breakers in all of the facility's 480 Volt unit substations would have to be retrofitted to have the following feature added. Upon the loss of all power, the main and tie breakers must open through the use of a stored electrical energy device called a capacitive trip unit. This accomplishes the removal of the loads before the black start is initiated. This retrofit affects three large frame breakers in each of the four unit substations for a total of 12. Buchart Horn has solicited quotes to have these modifications made by qualified field service personnel representing the manufacturer. Refer to the cost breakdown tables below for this pricing.

The second key step to initiate a black plant start is to disconnect the facility and the micro-turbines from the utility. This is to allow the plant to operate as an "island" being powered only from the micro-turbines. Based on the system configuration this is achieved through opening the main breakers at 13,200 Volts at the service entrance switchgear. This equipment already has capacitive trip units on these breakers, but it was originally programmed to not operate its main breakers during a dual utility loss. Its original strategy was to remain in its last state and wait for one utility to return and then switch the plant to that line. So, as part of the black plant project, this re-programming would have to be done by field service engineers from that manufacturer. Additional modification to this gear includes control system wiring modifications to gain remote / manual control of these main breakers and monitor the status of the breaker control system using the plant's central computer.

Costs of Implementation:

The equipment modifications required to implement this black start strategy have recently been priced by Buchart Horn on behalf of the City. The costs quoted by the manufacturers are surprisingly high. In general, this elevated cost is because the required modifications must be carried out by field service engineers and/or technicians representing the manufacturer of each piece of switchgear apparatus. The age and condition of the plant's unit substations, lack of consistent electrical maintenance and unavailability of record shop drawings for most of the equipment present a substantial risk for these manufacturers and their quotes reflect that risk and engineering effort. Below is a summary of the costs for each gear line up.

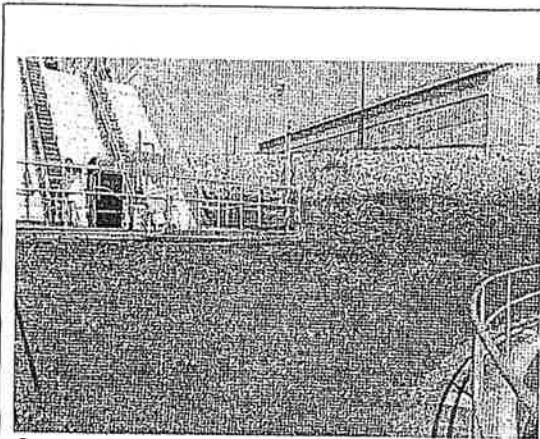
Identification:	Price:
Substation #1A	\$43,075.00
Substation #3	\$61,450.00
Substation #4	\$61,450.00
Substation #5	\$66,529.00

13,200 Volt SWGR	\$67,920.00
Total	\$300,424.00

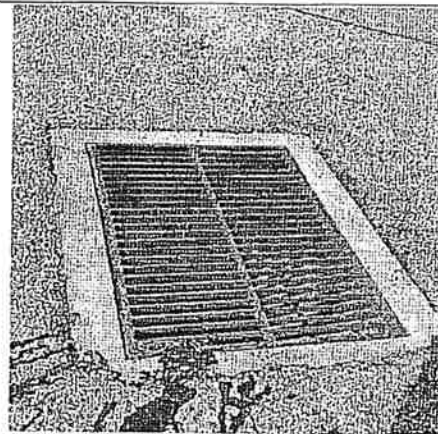
These costs do not include the labor and materials that would be incurred by an electrical contractor to assist with the operations, perform basic wiring modifications external to the switchgear and assist the plant operators with system testing and documentation. This could add another \$8,000 to \$12,000 depending on how the scope is outlined for the program. Based on these costs, Buchart Horn believes that alternative methodologies to implement a black plant start need to be investigated and evaluated for possible implementation. Additionally, Buchart Horn considers investing the above funding into switchgear that is past its useful life or nearing replacement as ill-advised. These funds may be better allocated on a new strategy or put towards global replacement of the majority of the switchgear in question.

Options moving forward in consideration of this event:

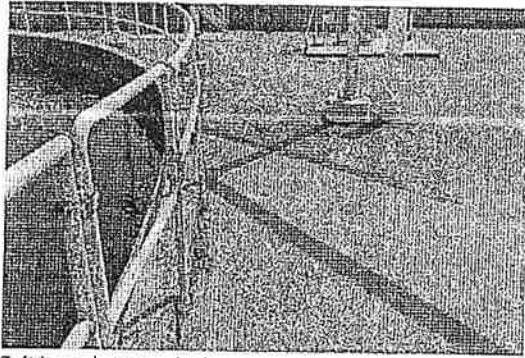
1. Because a dual service outage is so infrequent and this particular event was exacerbated by the fact that the service entrance switchgear was left in "manual mode" over the weekend after a testing event, it is recommended that the training program for the facility employees be updated and that clear step by step instructions be posted at the equipment that outline switching scenarios. An update of employee safety training should also be included in this effort.
2. Revisit the manual black plant operation and train any new plant personnel on this extensive switching operation.
3. Consider investments in UPS technology and develop a maintenance cycle with a third party to keep the equipment reliable. Control wiring modifications would still be required to allow the automation system to control a black plant start.
4. Install a "pony" generator to give the micro turbines a source to synchronize to and feed inrush energy into the transformers.



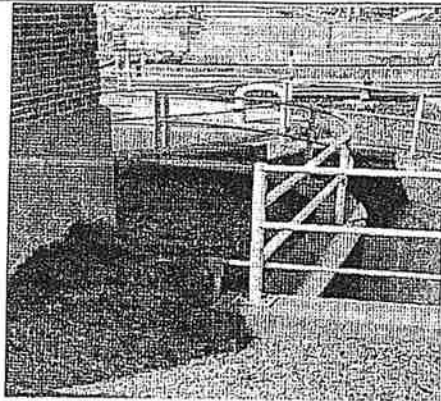
*Grease balls on ground adjacent to T2 Clarifier
- Cleaned on Feb 26- Mar 1, 2016*



*Sewage remnants on top of storm drain
-Washed down & cleaned on Feb 26, 2016*

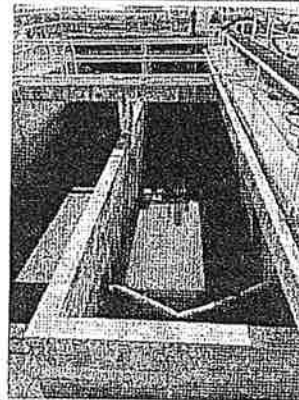
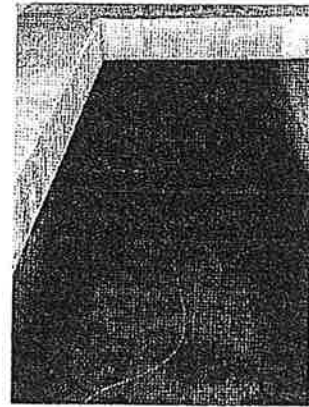


*Solids on the ground adjacent to T2 clarifier
-Hosed & cleaned on Feb 26, 2016*



*Water getting pumped to primary clarifiers' effluent
pit from the 001 storm water tank
-Continued until final cleanup, done in Mar 18, 2016.*

Pictures of Storm water basin cleanup



Sincerely;

James E. Gross, Director
Department of Public Works



July 1, 2016

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7009 2820 0000 5819 5925

Mr. James Gross
York City STP
345 East Market Street
York, PA 17403

Re: NPDES Permit Violations
York City STP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Gross:

This is to confirm the results of the Pennsylvania Department of Environmental Protection's (Department) inspections of the York City Sewage Treatment Plant (STP) facility on June 6, 2016 and June 28, 2016, which revealed the following violations:

NPDES Permit Part A.III.A. Representative Sampling

- DP002 final effluent composite sampler does not collect representative samples due to inaccurate final effluent flow meter.
- Influent composite sampler does not collect representative samples due to inaccurate influent flow meter.
- Secondary clarifier bypass composite sampler does not collect representative samples due to sampler location.

NPDES Permit Part B.I.D. Operation & Maintenance

- DP002 final effluent flow meter becomes inaccurate when effluent flows exceed 20 MGD.
- Malfunctioning sand filter treatment unit.
- Inoperable sluice gate valve on gravity discharge line from stormwater basin.

In response to these violations, I am requesting that you submit a full report of your own independent investigation, to include the circumstances leading to these violations, the details of the violations themselves, and the measures being taken to alleviate the problems, with associated dates and times. Any additional preventive measures you are planning should be outlined with an implementation schedule.

Clean Water Program
Southcentral Region | York District Office
150 Roosevelt Avenue, Suite 200 | York, PA 17401-3381 | 717.771.4481 | F 717.845.3496
www.depweb.state.pa.us

York City STP


- 2 -

March 23, 2016

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.771.4466. Thank you.

Sincerely,



Austin N. Pardoe
Water Quality Specialist
Clean Water Program

Enclosure: Copy of inspection report from: 2/25/2016.

cc: Hidalgo Diaz, York City STP Operator; HDiaz@yorkcity.org

York City STP
PA 0026263

275TH ANNIVERSARY

1741-2016

James E. Gross
Director

Department of Public Works

The City of York Pennsylvania

101 S. George Street ❖ PO Box 509 ❖ York, PA 17405
www.yorkcity.org

Y-3-A

Honorable C. Kim Bracey, Mayor

July 27, 2016

Austin Pardoe Water Quality Specialist
PaDEP Southcentral Region
150 Roosevelt Avenue, Suite 200
York Pa 17401-3381

Reference: **NPDES Permit Violations**
York City STP
NPDES Permit No. PA 0026263
Manchester Township, York County



Mr. Pardoe,

In response to the July 1, 2016 Notice of Violation, the City of York has completed an investigation with STP personnel and with assistance from Buchart Horn, Inc., the City's consulting engineer. The following are responses to the individual items from the letter and from the June 6 and June 28, inspection reports.

DP002 final effluent composite sampler does not collect representative samples due to inaccurate final effluent flow meter.

Flow meters (Area/Velocity type) have been installed in the two 36" effluent pipes on July 12, 2016. The City's subcontractor is currently collecting data and reviewing for accuracy and consistency. The flow meters are programmed to provide information once flow levels exceed 19MGD. Beginning on August 1st, the flow meters will be collecting data and this data will be available through the internet initially. The City is requesting a three month time frame for trouble shooting the data and hopefully allowing for a high flow event to test the meters under those conditions. Beginning on November 1, 2016, the data will be programmed directly into the City's control system and be programmed with the effluent sampler for accurate control of the effluent sampler based on these flows.

Influent composite sampler does not collect representative samples due to inaccurate influent flow meter.

The reason for the inaccurate flow readings during the 6/6/2016 inspection was due to one of the two bar screens was out of service for maintenance. With one bar screen out of service the flow hydraulics are not smooth entering the location of the flow meter. When both bar screens are operating the flow metering is accurate and the flow meters are programmed correctly to the influent sampler. Typically both bar screens are in service and have been since 6/28/16.

Secondary clarifier bypass composite sampler does not collect representative samples due to sampler location.

The City will be adding a new composite sampler at a location that will be providing representative sampling during a bypass situation. This work is expected to be completed by September 1, 2016.

DP002 final effluent flow meter becomes inaccurate when effluent flows exceed 20 MGD.

The new effluent flow meters that have been installed will be fully operational and programmed into the City's control system by November 1, 2016.

Malfunctioning sand filter treatment unit.

The sand filters are now all online and operational. This was noted in the 6/28/16 inspection by Mr. Pardoe. Sand Filter no 1 was put back online on June 17, 2016 and Sand Filter no 2 was back online on June 22, 2016

Inoperable sluice gate valve on gravity discharge line from stormwater basin.

The City has contracted with Buchart Horn to investigate the replacement or relocation of the referenced sluice gate. The investigation is expected to be completed by November 1, 2016. Installation/replacement of the gate is expected to be completed by November 1, 2017.

The following are items from the inspection reports of 6/6/16 and 6/28/16.

001 had no discharge occurring out through large portion of headwall structure. RECOMMEND determining destination of side discharge pipe located within basin of headwall structure

Please see attached narrative description and schematic for summary.

Hidalgo indicated bleed valve systems are malfunctioning in Train 2. Recommend fixing within 60 days.

The Train 2 bleed valve motors were installed on June 6, 2016 and back online on June 10, 2016.

Lab Accreditation expiration -7/31/16. Renewal application submitted.

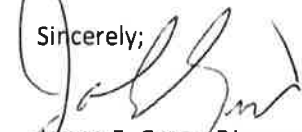
The Accreditation was received and is posted.

Stormwater requirements: PPC, Annual Inspections (performed 5/18/2015)-RECOMMEND calculating drainage areas.

The drainage areas will be calculated for inclusion in 2016 PPC plan.

In addition the current NPDES permit application will be amended to include the stormwater discharge location referenced in this response letter.

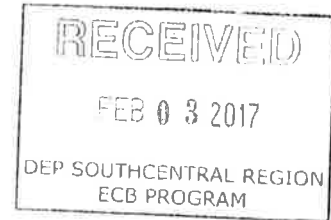
Sincerely;



James E. Gross, Director
Department of Public Works



File-AST



January 31, 2017

JAMES E GROSS
YORK CITY SEW AUTH YORK CNTY
1701 BLACK BRIDGE RD
YORK PA 17402-1911

NOTICE OF VIOLATION

Re: Past due aboveground storage tank integrity inspection(s).

YORK WWTP, Facility No. 67-63954

Manchester Twp, York County

Dear JAMES E GROSS:

On August 01, 2016, the Pennsylvania Department of Environmental Protection (DEP) sent you a letter reminding you that an in-service and/or out-of-service integrity inspection(s) shall be completed by a DEP certified third-party inspector on the aboveground storage tank (AST) system(s) referenced in the table below. To date, DEP has no record that the requested integrity inspection(s) was/were performed.

Inspection requirements for regulated AST systems are established within the regulations promulgated under the Storage Tank and Spill Prevention Act in 25 PA Code, Chapter 245. Failure to have your AST systems(s) inspected by a DEP certified third-party inspector in accordance with established frequencies is a violation of 25 PA Code §§245.551-245.553 and/or §245.616.

DEP Tank ID	Capacity	Next Insp. Due Date	Inspection Type
003A	23650	10/23/2016	In-Service

The in-service and out-of-service integrity inspections that are required by the Storage Tank and Spill Prevention Act are intended to verify AST system and operator compliance with State and Federal requirements and to verify the AST system's suitability for continued service. The DEP certified third-party inspector reviews a tank owner's adherence to current codes of practice developed by nationally recognized associations, tank manufacturer's instructions, design engineer's specifications, and the technical and operations requirements contained in the act and regulations.

You are able to correct this/these violation(s) by doing one of the following:

JAMES E GROSS

- 2 -

January 31, 2017

1. In the event the requested integrity inspection(s) has/have already been completed by a DEP certified third-party inspector, please forward a copy of the inspection report(s) to this office; or
2. If the storage tank(s) was/were removed or permanently closed-in-place, please submit to this office an amended "Storage Tanks Registration / Permit Application Form" signed by the DEP certified individual that removed or permanently closed the storage tank(s); or
3. If the inspection(s) has/have not been completed, contact this office and provide the following information:
 - A. The date the inspection(s) is/are scheduled,
 - B. The DEP certified inspector's name and certification number, and
 - C. Your facility identification number.

Please contact Alex Eckman of the Division of Storage Tanks at 717.772.5827 to provide the information for choice 3, or if you have questions regarding the inspection(s), this letter or obtaining a certified inspectors list. **Please respond within the next ten (10) days.**

This Notice of Violation is neither an order nor any other final action of the DEP. It neither imposes nor waives any enforcement action available to the DEP under any of its statutes. If the DEP determines that an enforcement action is appropriate, you will be notified of the action.

Thank you for your cooperation.

Sincerely,



Chad M. Clancy
Solid Waste Program Specialist
Division of Storage Tanks

cc: Greg Bowman, Southcentral Regional Office
Facility File



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

July 26, 2017

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 9171 9690 0935 0134 1327 97

York City Sewer Authority
c/o Ms. Stacey R. MacNeal Esq.
Katherman, Heim & Perry
345 East Market Street
York, PA 17403

Re: Sewage 3-B
York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Ms. MacNeal:

As a follow-up to our July 20, 2017, field investigation of a discharge of approximately 416,000 gallons of stormwater contaminated with sewage solids centrate from the York City WWTP to the Codorus Creek, a water of the Commonwealth, I am requesting that you submit the following items within thirty (30) days of the date of this letter:

1. An Environmental Emergency Response Plan (EERP) for the York City WWTP. The York City WWTP EERP shall follow the Department of Environmental Protection's (Department's) *Guidelines for the Development and Implementation of Environmental Emergency Response Plans* (Doc. No. 400-2200-001). The York City WWTP EERP may be included as part of a facility's existing Emergency Response Plan, Spill Prevention, Control and Countermeasure Plan or Integrated Contingency Plan.

The Department's EERP Guidance Document can be accessed using the following steps:

- i. Type in DEP's eLibrary Web Address: www.elibrary.dep.state.pa.us
 - ii. Select: Technical Guidance Final Documents
 - iii. Select: Field Operations
 - iv. Select: *Guidelines for the Development and Implementation of Environmental Emergency Response Plans*
2. A timeline for identifying and labeling all drains at the York City WWTP that discharge to the stormwater basin.

York City Sewer Authority

- 2 -

July 26, 2017

3. A summary of the work completed to pump out and clean the stormwater basin.
4. A schedule for repairing the audio/visual alarm systems installed on the plastic centrate holding tanks and connecting alarms systems to the WWTP SCADA system.

The above-referenced discharge to waters of the Commonwealth constitutes a violation of Sections 201 and 202 of The Clean Streams Law, 35 P.S. Section 691.1 et seq. Immediate notification to this office, in conjunction with containment and cleanup, is required by the Department's regulations in the event of an incident that causes or has the potential to cause such a discharge.

York City's failure to take necessary measures to prevent pollutants from reaching waters of the Commonwealth is a violation of 25 PA Code § 91.34(a) which states "persons engaged in an activity which includes the impoundment, production, processing, transportation, storage, use, application or disposal of pollutants shall take necessary measures to prevent the substances from directly or indirectly reaching waters of the Commonwealth, through accident, carelessness, maliciousness, hazards of weather or from another cause."

A copy of the Department's July 20, 2017, incident response report is attached for your records.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.705.4775 or eammon@pa.gov.

Sincerely,



Erick M. Ammon
Environmental Protection Compliance Specialist
Clean Water Program

Enclosure: 07/20/2017 Incident Response Report

cc: Mr. Frankie Campagne, York City WWTP General Manager
Mr. Brent R. Herring, York City WWTP Operations Manager

**SEWAGE COMPLIANCE INSPECTION REPORT**

NPDES / WQM Permit No. PA0026263	Mo/Day/Year 7/20/2017	Entry Time 10:00	Exit Time 11:45	Inspection Type INCDT	eFACTS Inspection ID 2618883
Facility Name: York City STP			Permittee Name: Mr. James Gross		
Physical Location/Directions: 1701 Black Bridge Road, York, PA 17402				Permit Expiration Date: 1/31/2013	
Municipality: Manchester Township		County: York County		Permit Renewal Application Due: In Renewal (Draft)	
Facility Type: <input checked="" type="checkbox"/> Municipal <input type="checkbox"/> Non-Municipal		<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor		Treatment Process: <input checked="" type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC	
Design Flow: 26.0 MGD		<input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon		<input type="checkbox"/> Other:	
Responsible Official: Mr. Frankie Campagne			Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Title: General Manager			Operator Name: Hidalgo Diaz		
Permittee Address: 345 E Market Street York, PA 17403			Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
			Client ID: 309032 License Expiration Date: 9/30/2019		
			Class-Subclass(es): A1		
			Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Business Phone: 717-845-2794			Business Phone: 717-845-2794		
Cell Phone: 717-324-6572			Cell Phone:		
Email: fcampagne@yorkcity.org			Email: hdiaz@yorkcity.org		
24-Hour Emergency Contact Person / Phone / Email: Hidalgo Diaz / 717.845.2794					
VIOLATIONS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Sample Results					
<p>The discharge of up to 416,000 gallons of stormwater contaminated by sewage solids centrate to the Codorus Creek, a water of the Commonwealth, is a violation of your NPDES Permit and section 201 & 202 of the PA Clean Streams Law.</p> <p>Failure to orally notify the Department within 4 hours of a pollution incident is a violation of Part A.III.C.4 of your NPDES Permit.</p>					
Recommendations:					
I recommend installing secondary containment around indoor centrate holding tanks.					
I strongly recommend that the centrate holding tank alarm system be connected to the WWTP's SCADA system.					
I strongly recommend that the most senior manager at the STP register as the operator in responsible charge (OIC).					
I strongly recommend reviewing the safety and operability of the current centrate collection, storage and pumping system.					
I recommend having the permittee on the NPDES Permit amended to the active director for the Public Works Department.					
Person Interviewed: Copy mailed with NOV.		Date:		Inspector: Kevin Buss	
Signature:		Phone No.:		Date: 7/20/17	
				Inspector Signature:	
				Phone No.: 610-916-0132	
Title:		Title: Water Quality Specialist			
Email:		Email: kbuss@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/or review of Department records.					

Comments

INCDT response at York City STP today with Erick Ammon (PA DEP Compliance Specialist).
On Tuesday, July 18th, 2017, Mr. Diaz called the Department's York District Office general phone number to notify the Department of a discharge of centrate to the onsite stormwater collection system, contaminating stormwater discharges from the onsite stormwater catch basin to the Codorus Creek.

Met onsite by Mr. Frankie Campagne (York STP General Manager), Mr. Brent Herring (York STP Operations Manager) and Mr. Hidalgo Diaz (York STP Operator in Responsible Charge/Day Shift Supervisor). Weather is hot & humid. Mr. Campagne and Mr. Herring were hired by YCSA in early 2017.

A 5-day incident response letter was received from Mr. Diaz by email on Wednesday July 19th (attached).
On Monday, July 17, 2017, Mr. Diaz discovered the discharge during a review of the weekend log books. Mr. Diaz then disabled the automatic operation of the stormwater discharge pumps to DP001 and STP staff collected a grab sample of the remaining stormwater in the catch basin and applied lime to the surface of the ground in areas affected by the spill. Mr. Diaz has estimated that between Saturday, July 15th and Monday, July 17th, a maximum of 416,000 gallons of stormwater contaminated by the spilled centrate was discharged from the stormwater catch basin to outfall DP001 to the Codorus Creek, a water of the Commonwealth.

At approximately 11:25 on Saturday, July 15, 2017, the plastic centrate holding tanks in the STP solids handling building overflowed to the surface of the ground and discharged an estimated 1,900 gallons to the onsite stormwater collection and conveyance system. The centrifuge operator in the solids handling building when the spill was noted recorded the centrate spill and discharge to the stormwater system in the daily log, but failed to notify the Department or STP supervisory staff. After the operator noted the spill, he bypassed the overflowing plastic storage tanks, rerouting centrate flows to the STP influent for treatment. During the next shift, the operator in the solids handling building returned centrate flows back to the plastic centrate storage tanks and all operations resumed normally.

Toured facility with Mr. Diaz.

One of two centrifuges operating at the time of inspection. STP operators have surrounded centrifuge pad with a flexible secondary containment boom system. It appears that the flexible containment booms have been installed to contain centrate overflows from the pad that discharge to a stormwater catch basin located outside the overhead door between the solids handling building and outdoor centrate holding tanks.

When centrifuges are in operation, the centrate discharges by gravity to two plastic centrate holding tanks located on the first floor of the solids handling building. The plastic centrate holding tanks are equipped with level sensors and a level alarm system. A pair of pumps sends centrate from the plastic centrate holding tanks out to the outdoor centrate storage tanks used for dosing the Ostara struvite capture process.

A valve on the plastic centrate line can be opened to return centrate directly to STP influent trough for treatment.

Mr. Diaz tested the audible/visual high level alarm in the plastic centrate holding tanks. The audible alarm was operational but the light was not. The plastic centrate holding tank and centrate pumping system PLC panel is not connected to the STP SCADA system. Checked alarms recorded on centrate pump PLC Panel. A high-level alarm was triggered for tank 1 at 11:02:32 on July 15th. There were several other high level alarms noted on July 15th.

At the time of the Departments response, the staff at the STP were unsure what caused the plastic storage tanks to overflow.

Outdoor centrate storage tank was observed. Centrate discharge to tanks has brown tint with visible suspended solids. The centrifuge operator can visibly see centrate discharge to outdoor centrate tanks. The operator discovered the spill when the operator notices that there was no discharge to the outdoor centrate tank. The surface of the tank is covered with a thin layer of dark brown scum. No malodors noted. Centrate from the plastic storage tanks is discharged to the outdoor tanks through a 6" flexible wastewater hose.

Stormwater catch basin was observed. Surface is mostly covered in duckweed. Mr. Diaz plans to use a trailer mounted pump (onsite) and a 6-inch portable pump to send remaining contents of stormwater catch basin to the STP primary clarifier effluent trough for treatment. Once empty, STP staff will clean (pressure wash) the stormwater catch basin and return it to normal operation.

Met with Mr. Campagne and Mr. Herring to discuss incorporating management strategies at STP. Now that YCSA has filled upper-level management vacancies at the STP, Mr. Campagne and Mr. Herring have a rough timeline for reviewing and revising Employee Training Plans, Standard Operating Procedures, Emergency Response Protocols and Operation & Maintenance systems at the STP. Additionally, an upgrade of the SCADA and computerized O&M systems is planned.

Photos

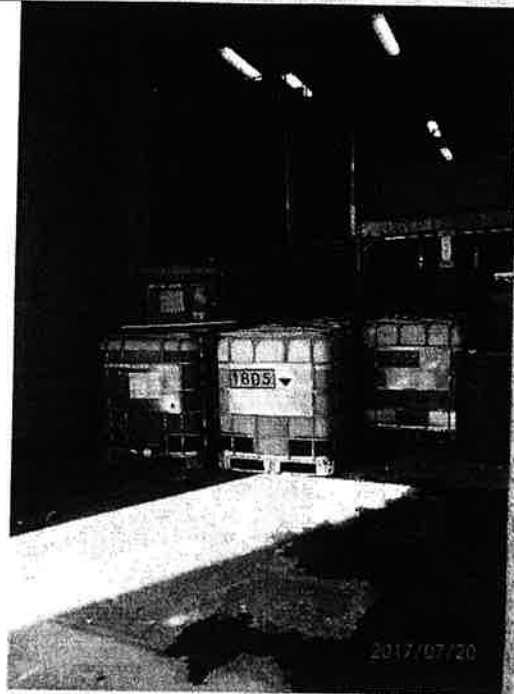


Figure 1- Photo by Kevin Buss, Centrate holding tank inside the solids handling building. Centrate overflowed from storage tanks (top-center of photo) and spilled to ground level and discharging through overhead door at bottom of photo to paved area below sludge storage silo.

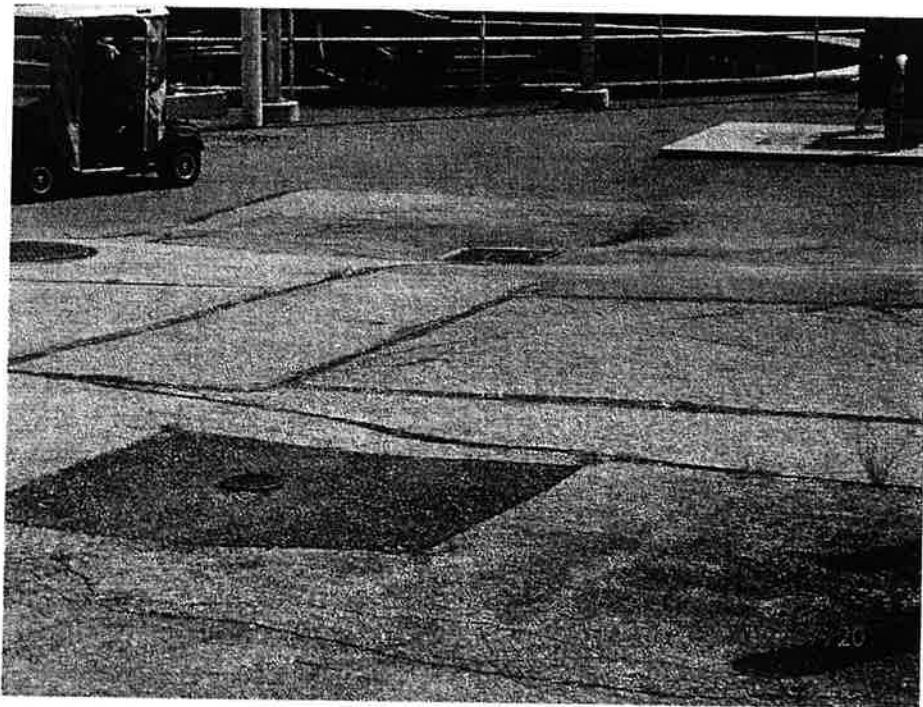


Figure 2- Photo by Kevin Buss, Paved area between the solids handling building and storm drain. Centrate discharge flowed from solids handling building to the storm drain in center of photo. Train #2 final clarifiers at top of photo.



The City of York Pennsylvania

101 South George Street • PO Box 509 • York, PA 17405

www.yorkcity.org

Honorable C. Kim Bracey, Mayor

David R. Hartke
Operations Manager
City of York Wastewater Treatment Plant
1701 Black Bridge Road
York, PA 17402

August 25, 2017

Erick Aronson
Environmental Compliance Specialist
Clean Water Program
Southeastern Regional Office
909 Elmwood Avenue
Harrisburg, PA 17110-8200

Subject: City of York Wastewater Treatment Plant NPDES Permit Number PA0026267
Notice of Violation Letter Dated July 26, 2017

Dear Mr. Aronson:

As a follow-up to your letter of July 26, 2017, the York City Sewer Authority is providing its response to the requested items as follows:

Item Number 1 directed that we provide an Environmental Emergency Response Plan for the York City WWTP. The WWTP has an Emergency Response Plan that is updated annually and last updated in August 2016, of which the table of contents are enclosed as Attachment 1. In reviewing this we determined that there is no specific section addressing non-hazardous wastewater spill management. Attachment 2 is the section that will be added to the Plan. A standard operating procedure for managing such incidents is provided as Attachment 3. Training will be provided to all operators during the month of September on these two items as well as the overall Plan. The WWTP's engineering consultants, Buchanan-Horn, has been contracted to update this Plan and is currently doing so.

Item Number 2 directed a timeline for identifying and labeling all drains of the York City WWTP that discharge to the storm water basin. All drains will be identified as being either in-plant drains or directly or indirectly draining to Codorus Creek. This activity will be completed by October 15, 2017.

Item Number 3 directed that a summary of the work completed to pump out and clear the storm water basin be provided. This work was completed by an outside contractor on August 2, 2017. The work consisted of pumping down the tank to the primary influent and clearing the tank. During this time we assessed the significant groundwater leak as requested and determined that a large concrete pipe to the tank has been compromised and requires repair. We are currently assessing this issue. We also replaced a sump pump in the tank allowing the tank contents to be pumped when so needed back to the process if needed. This tank was placed back in service and automatic control was re-enabled.

Item Number 4 directed that we provide a schedule for repairing the audio visual alarm systems installed on the plastic concrete holding tanks and connecting the alarm systems to the WWTP SCADA systems. The inspection

report also recommended the installation of secondary containment around the centrate tanks. We have evaluated the cost and timeline of being able to accomplish these actions.

In response to this, we are proposing an alternative, discussed with you during the Biosolids Compliance Inspection meeting on August 3, 2017, of rerouting the centrate flow from the centrifuges directly to the outside centrate tanks. We will take the downstairs centrate tanks out of service. Quotes were obtained the purchase order has been approved by the City. The schedule calls for this work to be completed by November 30, 2017.

Thank you for your input and discussion.

Sincerely,

Original signed document sent by USPS

Brent R. Herring
Operations Manager

cc: Frankie Campagne, General Manager
Chaz Green, Director of Public Works
Hidalgo Diaz, Shift Supervisor
Sheera Ripple, Department of Environmental Protection
Kevin Buss, Department of Environmental Protection

Attachment 1: Emergency Response Plan Table of Contents
Attachment 2: Non-Hazardous Wastewater Spill Management Plan Section 4.3.2
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4.2.5 Non-Hazardous Wastewater Spills

Plant drains discharge to points outside the facility (Outfall 001-008), to a storm water collection and conveyance system within the plant for discharge by pumping to Codorus Creek or to treatment processes, or various wastewater system treatment components for further treatment. These drains are being marked with a painted stripe two or more inches in diameter with one of two colors to indicate the ultimate point of discharge.

In the event of a spill inside a building, the operator should contain the spill using sandbags or absorbent pads. Once the spill is contained, the operator should proceed to properly clean the spill and the immediate area, marking the area for caution until it is dry. Wastewater spills can be washed down any inside floor drain, provided that the material will not plug the drain.

All liquid spills outside any buildings must be contained immediately and all yard drains must be protected from the non-hazardous wastewater spill reaching the drain with the use of containment booms, sandbags, covers, absorbent pads, or any combination thereof. As is the case with all spills, a shift supervisor must be notified immediately to determine if what reporting, if any, is to be made and to who. In most cases significant non-hazardous wastewater spills will require reporting to PADEP within four hours.

Should a significant non-hazardous wastewater spill occur and such spill volumes are in locations they do not belong, then the shift supervisor is to call outside contractors for clean-up services to ensure the spill does not reach Codorus Creek. Taking the above actions will ensure that when and if a spill does occur, the spilled material can be handled and disposed of in a safe and appropriate manner.

Management of Non-Hazardous Wastewater Spills
Original Development Date: 08/06/17

Approved: _____
General Manager

Effective Date: 08/15/2017

Date: _____

Management of Non-Hazardous Wastewater Spills SOP OP-012 (Draft)

- 1.0 Definitions
- 1.1 An incidental spill is a small spill outside of the area where it would normally be located, easily contained and can be cleaned up in a short period of time.
 - 1.2 A large spill is one that is not an incidental spill.
 - 1.3 A non-hazardous wastewater spill is any spill that contains any amount of wastewater liquid, solids, or both in any stage of treatment.
- 2.0 Initial Assessment and Communications
- 2.1 A non-hazardous wastewater spill is any spill that contains any amount of wastewater flow or solids.
 - 2.2 Non-hazardous wastewater spills on the plant grounds of greater than fifty gallons is to be managed as a non-routine event requiring immediate attention and resources in containment and clean-up.
 - 2.3 All staff shall immediately work to contain and clean-up the spill.
 - 2.4 A shift supervisor is to be called immediately if one is not on-site. Continue calling in rotation until a shift supervisor is reached.
 - 2.5 In the event a shift supervisor is not available immediately, staff is to call the operations manager and/or general manager.
 - 2.6 Calls to management and clean-up is to be conducted at the same time by different team members to ensure the issue is immediately addressed.
 - 2.7 Chemical spills are handled according to procedures in the Emergency Response Plan.
 - 2.8 Notification to the PADEP is required to be made within four hours, which is to be done by a supervisor as soon as the situation is assessed but in no case later than four hours.
- 3.0 Response Procedure
- 3.1 The four fundamentals in responding to a spill are assessment, notification, containment, and clean-up and not necessarily in that order.
 - 3.2 Identify and/or confirm what was spilled.
 - 3.3 Assess the area for impacts and determine the flow path of the spilled material.
 - 3.4 Determine the source and take steps to stop the flow from the source.
 - 3.5 Immediately isolate any drains in the area of the spill or any area the spill may reach that discharge outside the plant with the use of sandbags or other flow control material.
 - 3.6 Immediately place the storm water pumps in the OFF position to prevent any pumping to Codorus Creek in the event the material has or may enter a storm drain.
 - 3.7 Contain the area and keep unauthorized personnel out.
 - 3.8 Wear appropriate PPE in cleaning up the spilled material.
 - 3.9 Use the available spill control materials available at multiple locations in the plant such as sandbags, absorbent pads, absorbent granular material, containment booms.
 - 3.10 Dispose of collected material properly.



March 25, 2019

NOTICE OF VIOLATION**CERTIFIED MAIL NO. 9171 9690 0935 0197 7770 72**

Mr. Chaz Green
York City Sewer Authority
345 East Market Street
York, PA 17403

Re: NPDES Permit Violations
York City STP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Green:

A review of past Discharge Monitoring Reports (DMRs) revealed the following violations of Part A.I.A. of your NPDES permit:

DMR Month	PARAMETER		DMR Value		Permit Limit	
7/31/2017	Ammonia-Nitrogen	Ave. Mo	7.1	mg/L	1.7	mg/L
9/30/2017	Fecal Coliform	IMAX.	3873	No./100 ml	1000	No./100 ml
1/31/2018	Ammonia-Nitrogen	Ave. Mo	2.8	mg/L	2.1	mg/L
4/30/2018	Ammonia-Nitrogen	Ave. Mo	3.4	mg/L	2.1	mg/L
5/31/2018	Ammonia-Nitrogen	Ave. Mo	458	lbs/day	369	lbs/day
5/31/2018	Ammonia-Nitrogen	Ave. Mo	4.9	mg/L	1.7	mg/L
7/31/2018	Fecal Coliform	Geo. Mean.	12869	No./100 ml	200	No./100 ml
7/31/2018	TSS	Wk. Ave.	49.3	mg/L	45	mg/L
7/31/2018	Fecal Coliform	IMAX.	48392	No./100 ml	1000	No./100 ml
7/31/2018	Ammonia-Nitrogen	Ave. Mo	5.3	mg/L	1.7	mg/L
7/31/2018	Total Phosphorus	Ave. Mo	6.3	mg/L	2	mg/L
7/31/2018	Fecal Coliform	IMAX.	48392	No./100 ml	1000	No./100 ml
7/31/2018	CBOD5	Wk. Ave.	6082	lbs/day	4120	lbs/day

7/31/2018	CBOD5	Wk. Ave.	24.6 mg/L	19 mg/L
7/31/2018	TSS	Ave. Mo	49.3 mg/L	30 mg/L
7/31/2018	Dissolved Oxygen	Minimum	2.9 mg/L	5 mg/L
7/31/2018	CBOD5	Ave. Mo	34.5 mg/L	13 mg/L
7/31/2018	CBOD5	Wk. Ave.	34.5 mg/L	19 mg/L
8/31/2018	Total Phosphorus	Ave. Mo	2.4 mg/L	2 mg/L
8/31/2018	Fecal Coliform	IMAX.	12098 No./100 ml	1000 No./100 ml
8/31/2018	TRC	Ave. Mo	0.24 mg/L	0.13 mg/L
8/31/2018	TRC	IMAX.	0.76 mg/L	0.44 mg/L
8/31/2018	Dissolved Oxygen	Minimum	2.6 mg/L	5 mg/L
8/31/2018	CBOD5	Ave. Mo	27 mg/L	13 mg/L
8/31/2018	Fecal Coliform	Geo. Mean.	201 No./100 ml	200 No./100 ml
8/31/2018	CBOD5	Wk. Ave.	27 mg/L	19 mg/L
8/31/2018	TSS	Ave. Mo	61 mg/L	30 mg/L
8/31/2018	TSS	Wk. Ave.	61 mg/L	45 mg/L
8/31/2018	Ammonia-Nitrogen	Ave. Mo	2.8 mg/L	1.7 mg/L
9/30/2018	Fecal Coliform	IMAX.	12100 No./100 ml	1000 No./100 ml
9/30/2018	Total Phosphorus	Ave. Mo	5.5 mg/L	2 mg/L
9/30/2018	TRC	Ave. Mo	1.22 mg/L	0.13 mg/L
9/30/2018	TRC	IMAX.	2.58 mg/L	0.44 mg/L
9/30/2018	Dissolved Oxygen	Minimum	2.4 mg/L	5 mg/L
9/30/2018	Ammonia-Nitrogen	Ave. Mo	7.2 mg/L	1.7 mg/L
9/30/2018	TSS	Ave. Mo	32.5 mg/L	30 mg/L
9/30/2018	CBOD5	Wk. Ave.	28.5 mg/L	19 mg/L
9/30/2018	CBOD5	Ave. Mo	28.5 mg/L	13 mg/L
11/30/2018	TRC	IMAX.	2.52 mg/L	0.44 mg/L
11/30/2018	Dissolved Oxygen	Minimum	3.3 mg/L	5 mg/L
11/30/2018	Ammonia-Nitrogen	Ave. Mo	3.3 mg/L	2.1 mg/L
11/30/2018	Total Phosphorus	Ave. Mo	2.5 mg/L	2 mg/L
11/30/2018	TRC	Ave. Mo	0.97 mg/L	0.13 mg/L

Be advised, failure to comply with the terms and conditions of your permit constitutes a violation of Sections 201 and 202 of the Clean Streams Law and subjects you to appropriate enforcement action.

Within 15 days of the date of this letter, please submit a written report to the Department explaining the cause of these violations and any measures taken to prevent future violations of this nature.

Due to the number and magnitude of violations, York City STP will be placed on the EPA's quarterly noncompliance report.

Mr. Chaz Green

- 3 -

March 25, 2019

This Notice of Violation is neither an order nor any other final action of DEP. It neither imposes nor waives any enforcement action available to DEP under any of its statutes. If DEP determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions concerning this notice, please contact me at 717.705.4789.

Sincerely,



Summer Kunkel
Water Quality Specialist Supervisor
Clean Water Program



The City of York
Pennsylvania

City of York
Department of Public Works

April 5, 2019

Ms. Summer L. Kunkel
Water Quality Specialist Supervisor
Clean Water Program
Department of Environmental Protection
909 Elmerton Ave.
Harrisburg, PA 17110

Re: March 25, 2019 NOV Letter

Dear Ms. Kunkel:

In response to your Notification of Violation (NOV) letter, the attached spreadsheet provides information of the most probable cause and our response for each violation observed. You will observe that we have been working diligently to address the challenges we've experienced. In addition to the responses noted on the spreadsheet, we are also in the process of several significant upgrades to the plant which we believe will improve our ability to remain compliant: beginning in May of this year, our Train 2 screw pumps are being replaced; this year we are also having a major overhaul of our primary FOG and scum removal system; in 2020 we plan to have a replacement of our tertiary treatment process filtration system.

If you need additional information on this subject matter, feel free to contact me any time. I could be reached at mobile # 717-324-6599.

Respectfully,

Chaz A. Green
Director of Public Works



Cause & Response to Violations listed in NOV Letter dated 03-25-2019

Date	Parameter	Statistic	Value Reported	UNITS	Permit Limit	Outfall	CAUSE	RESPONSE
7/31/2017	Ammonia	Avg Mo	7.1	mg/l	1.7	001	Centrate spilled into stormwater basin via floor drain due to equipment malfunction	Centrate discharge line re-routed to bigger tank to prevent future spills.
9/30/2017	Fecal Coliform	IMAX	3873	#/100 mL	1000	002	Contractor reversed polarity of generator during maintenance which disturbed clarifier blankets	Corrected the connections and blankets improved promptly
1/31/2018	Ammonia	Avg Mo	2.8	mg/L	2.1	002	Exact cause is unknown. Extreme cold weather. Experienced adverse bio conversion reactions.	Increased MLSS concentrations to improve bio-conversions
4/30/2018	Ammonia	Avg Mo	3.4	mg/l	2.1	002	Exact cause is unknown. Biology transitioning from winter to summer conditions. Experienced RAS bleed valves mechanical issues. Over wasting mixed liquors	Adjusted MLSS concentrations again. Decreased wasting rates. Slowly adjusting for summer conditions
5/31/2018	Ammonia	Avg Mo	4.58	lbs/day	3.69	002	Continuation of event from April. Over wasting rates still high	Reducing wasting some more to increase nitrifier and denitrifier populations, and age of biomass. Target MLSS 3000
5/31/2018	Ammonia	Avg Mo	4.9	mg/l	1.7	002	Bio-mass too young for desired bio conversions	to 3500 mg/l
7/31/2018	Fecal Coliform	Geo Mean	12869	#/100 mL	200	001	The plant does not have the technology to chlorinate based on loading. Chlorination is applied manually, and we ran out of sodium hypochlorite during this event.	Chlorine supply inventory changed to rates for a better chlorine quality. Chlorine injection site and dose modified for a better fecal control
7/31/2018	Fecal Coliform	IMAX	48392	#/100 ml	1000	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	Ammonia	Avg Mo	5.3	mg/l	1.7	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	Phosphorus	Avg Mo	6.3	mg/l	?	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	TSS	Avg Mo	49.3	mg/L	30	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	TSS	Weekly Avg	49.3	mg/L	45	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	DO	Minimum	2.9	mg/L	5	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination. DO low due to sampling location	Sampling location best available given the design of the 001 EFF and safety of operators during storm events. Screw pump replacement project in process which will decrease reliance on 001 EFF.
7/31/2018	CRODS	Avg Mo	34.5	mg/l	13	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
7/31/2018	CRODS	Weekly Avg	34.5	mg/l	19	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw Pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design

Cause & Response to Violations listed in NOV Letter dated 03-25-2019

Date	Parameter	Statistic	Value Reported	UNITS	Permit Limit	Outfall	CAUSE	RESPONSE
7/31/2018	Fecal Coliform	IMAX	48392	#/100 mL	10000	002	Hydraulic surge and higher solids after high flow events limit UV effectiveness in disinfection	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process. Tertiary Filter replacement project in design. Process control recovery after High Flow SOP usage ends needs adjustment
7/31/2018	CBOD5	Weekly Avg.	6082	lbs/day	4120	002	Hydraulic surge and higher solids after high flow events limit UV effectiveness in disinfection. Higher solids also lead to higher CBOD in effluents	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process. Tertiary Filter replacement project in design. Process control recovery after High Flow SOP usage ends needs adjustment
7/31/2018	CBOD5	Weekly Avg.	24.6	mg/l	19			
8/31/2018	Phosphorus	Avg Mo	2.4	mg/l	2	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
8/31/2018	Fecal Coliform	IMAX	12098	#/100 mL	10000	002	Hydraulic surge and higher solids after high flow events limit UV effectiveness in disinfection	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process. Tertiary Filter replacement project in design. Process control recovery after High Flow SOP usage ends needs adjustment
8/31/2018	TRC	Avg Mo	0.24	mg/L	0.13	001	the plant does not have the technology to chlorinate based on loading. Chlorination is applied manually. The plant does not have the technology to dechlorinate	Chlorine supply inventory changed to tanks for a better chlorine quality. Chlorine injection site and dose modified for a better fecal control
8/31/2018	TRC	IMAX	0.76	mg/L	0.44			
8/31/2018	DO	Minimum	2.6	mg/l	5	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination. DO low due to sampling location.	Sampling location best available given the design of the 001 EFF and safety of operators during storm events. Screw pump replacement project in process which will decrease reliance on 001 EFF
8/31/2018	CBOD5	Avg Mo	27	mg/l	13	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
8/31/2018	CBOD5	Weekly Avg.	27	mg/L	19			
8/31/2018	Fecal Coliform	Geo Mean	201	#/100 mL	200	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
8/31/2018	TSS	Avg Mo	61	mg/l	30	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
8/31/2018	TSS	Weekly Avg.	61	mg/l	45			
8/31/2018	Ammonia	Avg Mo	2.8	mg/L	1.7	001	High Flow SOP in use & 001 EFF opened due to storm event. Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
9/30/2018	Fecal Coliform	IMAX	12100	#/100 mL	10000	002	Hydraulic surge and higher solids after high flow events limit UV effectiveness in disinfection	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process. Tertiary Filter replacement project in design. Process control recovery after High Flow SOP usage ends needs adjustment

Cause & Response to Violations listed in NOV Letter dated 03-25-2019

Date	Parameter	Statistic	Value Reported	UNITS	Permit Limit	Outfall	CAUSE	RESPONSE
9/30/2018	Phosphorus	Avg Mo	5.5	mg/l	2	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
9/30/2018	TRC	Avg Mo	1.27	mg/l	0.13	001	The plant does not have the technology to chlorinate based on loading. Chlorination is applied manually. The plant does not have the technology to dechlorinate	Chlorine supply inventory changed to notes for a better chlorine quality. Chlorine injection site and dose modified for a better fecal control
		IMAX	2.58	mg/l	0.44			
9/30/2018	DO	Minimum	2.4	mg/l	5	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination. DO low due to sampling location	Sampling location best available given the design of the 001 EFF and safety of operators during storm events. Screw pump replacement project in process which will decrease reliance on 001 EFF.
9/30/2018	Ammonia	Avg Mo	7.7	mg/l	1.7	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
9/30/2018	TSS	Avg Mo	34.5	mg/l	30	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
		Weekly Avr	28.5	mg/l	19			
9/30/2018	CBOD5	Avg Mo	28.5	mg/l	13	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
		Weekly Avr	28.5	mg/l	13			
11/30/2018	DO	Minimum	3.3	mg/l	5	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination. DO low due to sampling location	Sampling location best available given the design of the 001 EFF and safety of operators during storm events. Screw pump replacement project in process which will decrease reliance on 001 EFF.
11/30/2018	Ammonia	Avg Mo	3.3	mg/l	2.1	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
11/30/2018	Phosphorus	Avg Mo	2.5	mg/l	2	001	High Flow SOP in use & 001 EFF opened due to storm event Hydraulic loading leads to partial treatment with manual chlorination	Primary Clarifier overhaul scheduled for 2019. Screw pump replacement project in process which will decrease reliance on 001 EFF. Tertiary Filter replacement project in design
11/30/2018	TRC	IMAX	2.52	mg/l	0.44	001	The plant does not have the technology to chlorinate based on loading. Chlorination is applied manually. The plant does not have the technology to dechlorinate	Chlorine supply inventory changed to notes for a better chlorine quality. Chlorine injection site and dose modified for a better fecal control
		Avg Mo	0.97	mg/l	0.13			



The City of York Pennsylvania

101 South George Street □ PO Box 509 □ York PA 17405
www.yorkcity.org

Honorable C. Kim Bracey, Mayor

*James E Gross
Director
Department of Public Works*

April 18, 2016

Austin N. Pardoe
Water Quality Specialist
Clean Water Program
PA DEP
150 Roosevelt Avenue, Suite 200
York, PA 17401-3381

Circumstances leading to the problem

On February 24, 2016 at around 1820 hours we had a severe thunderstorm at the York City WWTP which brought us electrical problems in the main switchgear and substation 4 and 5 and as a result, we were left in an electrical blackout.

Incident details

The main switchgear that feeds the entire plant has dual utility power feeds. (Smith St. and Pleasureville). Since there had been a recent investigation into suspected power quality issues with the Smith Street (normal) line, the plant was temporarily operating from the Pleasureville (emergency backup) line. At one point during the incident, the Pleasureville line lost power. The Smith Street line was still available but since the switchgear was in manual operation mode it did not / could not automatically seek out the remaining source. This happened around 1820 hours.

Because of this we had no power from either source for a period of time. Plant operations had to call an electrical contractor to assist in restoring power. They arrived and were able to restore power to the switchgear from the Smith Street side at about 2030 hours. Once we had power in our main switchgear, we found out that two of our substations (4 and 5), also had power distribution problems. Substations 4 and 5 had both feed side breakers tripped which made power inaccessible to essential pumps (Raw Sewage and Primary Effluent pumps). The breakers were reset and we had the power restored at about 2045 hours. At this time, all Plant equipment was being turned on to try to get a handle on the high flow.

Train 2 is located in a low area and the lack of power caused us to have an overflow in this area. The last registered flow to the STP was about 28mgd but during the blackout it increased to nearly 51mgd. Since we could not pump any water out from this low area the overflow took place. We had three areas overflowing:

1. The 3 Train 2 Final clarifiers
2. The mixed liquor channel (BNR effluent)
3. The Primary Effluent wet well

The first two started to overflow at around 2000 hours. It was a mixture of secondary effluent from the final clarifiers and mixed liquor from the BNR effluent channel. The primary effluent wet well started to overflow shortly afterwards. This was mainly raw sewage, some primary effluent and a little mixed liquor. Since we were not getting water out of Train 2 through the effluent screw pumps, the overflow water started to gain way to the two splitter boxes in the secondary clarifiers, which lead to the storm water basin. The other part of the flood was around the primary effluent building, which was flooding the basement and some of the water was going through storm drains nearby to the storm water basin as well.

When we got the power restored and started to turn equipment online, we had to turn the Storm Water pumps on to draw the water level low around the primary effluent pump building and avoid further flooding the basement to keep our motors dry. The flooding did not start until about 2000 hours and was over at around 2200 hours. Due to the circumstances we had to turn on our storm water pumps to avoid imminent flooding, and the first rush of water was not chlorinated. Sodium Hypochlorite addition began shortly after the pumps were turned on. Pumping runtime was from 2045 hours to 2106 hours and it is estimated that around 0.45mgd of the initial storm water in the basin, mixed with the overflow from the three afore mentioned sources, was discharged from Outfall 001.

Measures taken to alleviate the problem

- We filled five primary and one secondary clarifiers to delay the flood but it was too much water to contain using Train 2 only. This was done around 1845 hours on Feb 24, 2016.
- Sodium Hypochlorite was dosed to the storm water discharge through the 001 effluent. Approximately from 2050 hours to 2120 hours on Feb 24, 2016.
- At about 1940 hours, we requested Springettsbury Township to cease sending us flow since we had no way of treating it.
- Storm water sequence disabled around 2200 hours on Feb 24, 2016 to contain contaminated water in the basin until cleanup was performed.
- Storm water basin cleanup was completed on March 18, 2016.

Additional preventive measures planned outlined & implementation schedule.

The City of York has contracted Buchart Horn to further study the Black Plant operation at the York City WWTP. A report prepared by Buchart Horn is attached. Work will continue on the Black Operation in 2016. The City of York can provide updates to PA DEP as this work progresses.

Buchart Horn's report follows:

Buchart Horn, Inc. has been asked to address the overall state of the York City Sewage Treatment plant's electrical distribution system, outline various problems, and recommend solutions. Evaluations of equipment conditions have been recently submitted for the authority's consideration and replacements have been bid but halted due to financial constraints. This report / letter is intended to provide an overview and recommendations along with some history of the black plant start issue and how it interrelates to the system's operation as a whole.

BLACK PLANT START:

Electrical Service History

This facility has been historically fed from two separate electrical services, a main and an emergency primary service, emanating from two separate utility owned substations. This arrangement provides a high level of availability for electric power needed to keep the plants processes online. MET ED, a First Energy Company, provides these primary metered services at 13,200 Volts. The primary service named "Smith Street" is very reliable and stable. It is for this reason, that the plant is normally connected to this line. The emergency service, named Pleasureville, after the location of the utility substation that it is derived from, has less overall capacity than Smith Street. The authority pays a utility fee to have the capacity to operate the entire plant from the Pleasureville service. This reserve capacity was negotiated with the utility and the utility maintains the reserve capacity by not allowing other customers to load the line above the level that the York City Sewer Plant needs to operate.

As mentioned above, this dual service arrangement from Met-Ed provides the plant with a high level of availability because the reliability of one service does not expose the plant to extended outages. In fact, based on the memory of Buchart Horn's experience at this facility during the past 45 years, the plant has only ever experienced 3 dual outages; One during Hurricane Agnes in 1972, the next time was during a switching anomaly in 2013 and most recently on Wednesday, February 24th 2016 as a result of a storm that produced tornadic winds in a neighboring county.

Co-Generation History

In the past, the facility had an additional source of electrical power. This came in the form of its onsite digester gas co-generation facility which consisted of three parallel reciprocating engine natural gas generators. These generators were designed to use a mixture of digester gas and natural gas to "push" power onto the plant's electrical distribution system. They were connected to the distribution system through Substation #3 on the 480 Volt side. The energy they produced was available throughout the plant by feeding the substation transformers "backwards" through Substation #3 and out to the 13,200 Volt plant wide distribution.

While operating in parallel with the utility, this system served to reduce the facility's electrical energy consumption and reduce its demand set point further reducing the utility charges. These units were able to operate the plant in a diminished capacity in the unlikely event of a dual service outage, but their primary purpose was energy savings using process byproducts. These units were originally commissioned in 1985 and served the facility well beyond their designed lifespan. When maintenance and reliability of the units began to make them more expensive to operate, they were slated for de-commissioning while a new technology was planned to replace them.

Implementing micro-turbines:

In 2011, the "old" co-generation system was replaced by micro-turbine technology. Micro-turbine generators use high speed turbines as their energy conversion medium. They burn natural gas and conditioned digester gas in much the same way a jet engine does to make mechanical energy that drives an alternator to make electrical power. The alternator is direct coupled to the shaft that spins at nearly 100,000 RPM. This produces a very high synchronous electrical frequency, 200 Hertz, which cannot be directly connected to the power grid which operates at 60 Hertz. The micro-turbine uses power electronics to convert this high frequency to a lower frequency that can be used by the rest of the plant's electrical apparatus.

It is these power electronics that require the plant to be operated differently when starting the electrical system during times that both utility services are lost. This operation is referred to as a "black plant start". Since the plant uses large substation transformers to distribute power from either the utility or from the co-generation system, the inrush of the transformers must be overcome. Inrush is the initial "surge" of electrical energy required by a transformer when it is first energized or switched on. This surge can be between 8 and 12 times

the amount of electrical current (amps) that a transformer operates at normally. Reciprocating engine generators were easily able to provide a large transformer's required inrush current because the wires from the alternator were connected through circuit breakers directly to the intended grid. Also, the alternator and its large magnetic field coupled to the engine inherently and provided the huge amount of stored energy required to feed many parallel transformers. This was the case with the old co-generation system.

Since the micro-turbine technology uses power electronics to transmit the electrical energy to the local grid, energizing the transformers requires a different strategy. The power electronics cannot be built to transmit up to 12 times more current than their nominal rating and if this is attempted they protect themselves and trip offline. According to the manufactures of these systems, the only way to energize a bank of transformers is to bring them up to full voltage and full frequency slowly via a process called ramping.

New Black Plant Start Strategy:

In order to ramp the transformers online gradually and in a controlled fashion, the facility loads should be disconnected from the grid during the ramp process. Exposing the process equipment to low frequency and low voltage during the ramp period will cause widespread damage to motor control systems, computer infrastructure and even lighting equipment. There is an acceptable range of frequency and voltage that the National Electrical Manufacturing Association (NEMA) sets as a standard to which manufacturers build equipment to withstand. The ramping process is well out of this range and therefore cannot be applied to the plant equipment during a black start.

In order to apply the ramping method with the plant loads disconnected, the main and tie breakers in all of the facility's 480 Volt unit substations would have to be retrofitted to have the following feature added. Upon the loss of all power, the main and tie breakers must open through the use of a stored electrical energy device called a capacitive trip unit. This accomplishes the removal of the loads before the black start is initiated. This retrofit affects three large frame breakers in each of the four unit substations for a total of 12. Buehart Horn has solicited quotes to have these modifications made by qualified field service personnel representing the manufacturer. Refer to the cost breakdown tables below for this pricing.

The second key step to initiate a black plant start is to disconnect the facility and the micro-turbines from the utility. This is to allow the plant to operate as an "island" being powered only from the micro-turbines. Based on the system configuration this is achieved through opening the main breakers at 13,200 Volts at the service entrance switchgear. This equipment already has capacitive trip units on these breakers, but it was originally programmed to not operate its main breakers during a dual utility loss. Its original strategy was to remain in its last state and wait for one utility to return and then switch the plant to that line. So, as part of the black plant project, this re-programming would have to be done by field service engineers from that manufacturer. Additional modification to this gear includes control system wiring modifications to gain remote / manual control of these main breakers and monitor the status of the breaker control system using the plant's central computer.

Costs of Implementation:

The equipment modifications required to implement this black start strategy have recently been priced by Buehart Horn on behalf of the City. The costs quoted by the manufacturers are surprisingly high. In general, this elevated cost is because the required modifications must be carried out by field service engineers and/or technicians representing the manufacturer of each piece of switchgear apparatus. The age and condition of the plant's unit substations, lack of consistent electrical maintenance and unavailability of record shop drawings for most of the equipment present a substantial risk for these manufacturers and their quotes reflect that risk and engineering effort. Below is a summary of the costs for each gear line up.

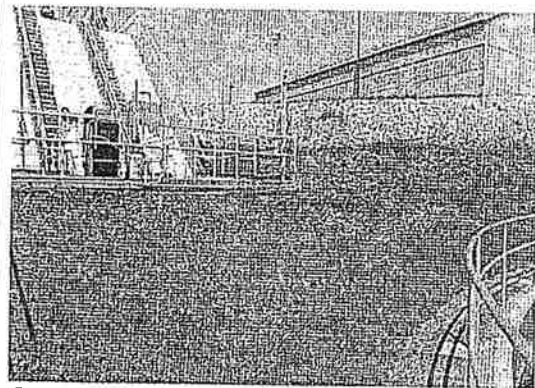
Identification:	Price:
Substation #1A	\$43,075.00
Substation #3	\$61,450.00
Substation #4	\$61,450.00
Substation #5	\$66,529.00

13,200 Volt SWGR	\$67,920.00
Total	\$300,424.00

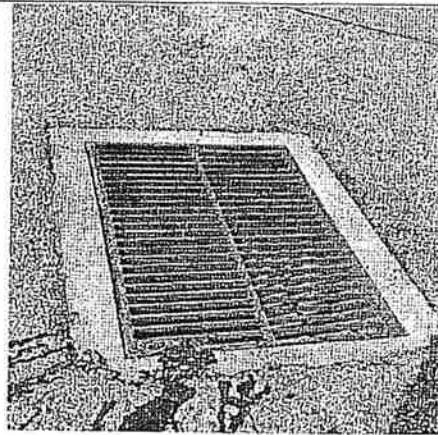
These costs do not include the labor and materials that would be incurred by an electrical contractor to assist with the operations, perform basic wiring modifications external to the switchgear and assist the plant operators with system testing and documentation. This could add another \$8,000 to \$12,000 depending on how the scope is outlined for the program. Based on these costs, Buchart Horn believes that alternative methodologies to implement a black plant start need to be investigated and evaluated for possible implementation. Additionally, Buchart Horn considers investing the above funding into switchgear that is past its useful life or nearing replacement as ill-advised. These funds may be better allocated on a new strategy or put towards global replacement of the majority of the switchgear in question.

Options moving forward in consideration of this event:

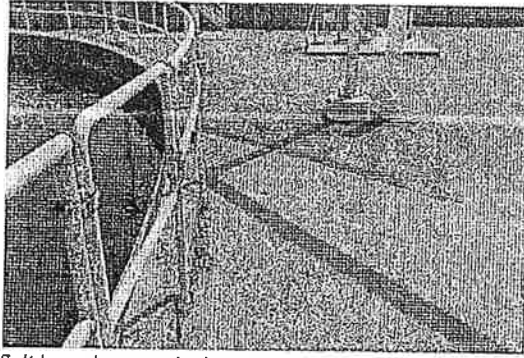
1. Because a dual service outage is so infrequent and this particular event was exacerbated by the fact that the service entrance switchgear was left in "manual mode" over the weekend after a testing event, it is recommended that the training program for the facility employees be updated and that clear step by step instructions be posted at the equipment that outline switching scenarios. An update of employee safety training should also be included in this effort.
2. Revisit the manual black plant operation and train any new plant personnel on this extensive switching operation.
3. Consider investments in UPS technology and develop a maintenance cycle with a third party to keep the equipment reliable. Control wiring modifications would still be required to allow the automation system to control a black plant start.
4. Install a "pony" generator to give the micro turbines a source to synchronize to and feed inrush energy into the transformers.



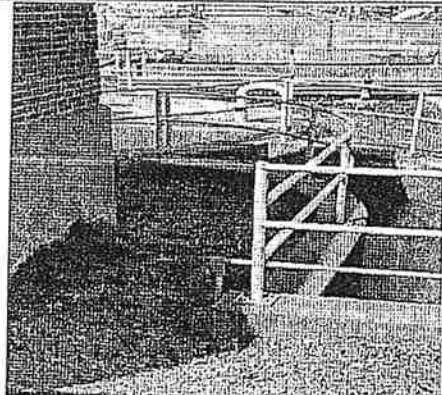
*Grease balls on ground adjacent to T2 Clarifier
- Cleaned on Feb 26- Mar 1, 2016*



*Sewage remnants on top of storm drain
-Washed down & cleaned on Feb 26, 2016*

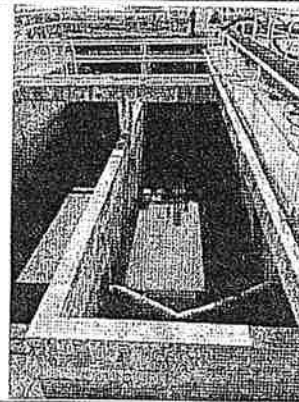
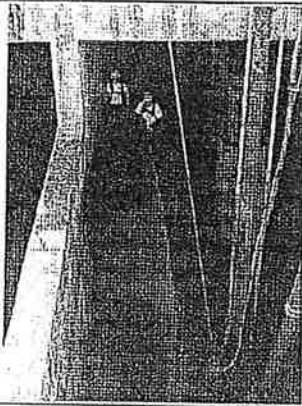
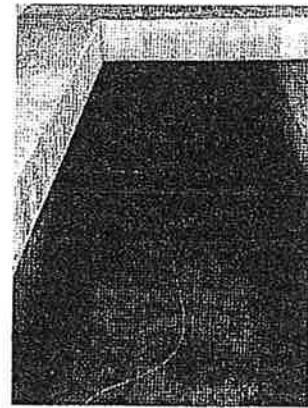


*Solids on the ground adjacent to T2 clarifier
-Hosed & cleaned on Feb 26, 2016*



*Water getting pumped to primary clarifiers' effluent
pit from the 001 storm water tank.
-Continued until final cleanup, done in Mar 18, 2016.*

Pictures of Storm water basin cleanup



Sincerely,

James E. Gross, Director
Department of Public Works



July 9, 2019

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 9171 9690 0935 0215 9095 15

Mr. Frankie Campagne
York City Sewer Authority
345 East Market Street
York, PA 17403

Re: York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Campagne:

On May 29, 2018, the Department of Environmental Protection (Department) conducted an inspection of the York City Wastewater Treatment Plant. During the inspection the following Violation was noted:

Taking the Sand Filters off-line is in violation of Part B.I.E of your NPDES Permit; Failure to Properly operate and maintain all facilities which are installed or used to achieve compliance

Please submit a written report to the Department within 15 days of receiving this letter explaining the cause of the Sand Filters being offline and a timeline for the Sand Filters being put back into service. Also, as referenced in the attached inspection report Recommendations, please include: The date the Sand Filters were taken out of service, a list of the 2018 and 2019 bypass discharges from Outfall 001, the bypass pumping capacity and proposed replacement screw pump capacity, the results from the 2018 I&I study, and a list of all planned upgrades and maintenance/repair along with the associated implementation timeframes.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.503.7121 or arandecker@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Austen Randecker".

Austen Randecker
Clean Water Program



SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026263	Mo/Day/Year 05/29/2019	Entry Time 07:30	Exit Time	Inspection Type RTPT	eFACTS Inspection ID
Facility Name: York City WWTP			Permittee Name: York City Sewer Authority		
Physical Location/Directions: 1701 Black Bridge Road, York PA				Permit Expiration Date: 08/31/2022	
Municipality: Manchester Township		County: York		Permit Renewal Application Due: 180 days prior to expiration	
Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor		Treatment Process: <input type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon			
Design Flow: 26 MGD		<input type="checkbox"/> Other:			
Responsible Official: Frankie Campagne			Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Title: General Manager			Operator Name: Frankie Campagne		
Permittee Address: 345 East Market Street York, PA 17403			Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Business Phone: 717.845.2794			Client ID: 336338 License Expiration Date: 6/30/2020		
Cell Phone: 717.324.6572			Class-Subclass(es): A,E-1,4		
Email: fcampagne@yorkcity.org			Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
24-Hour Emergency Contact Person / Phone / Email: Frankie Campagne 717.324.6572			Business Phone: 717.845.2794		
Cell Phone: 717.324.6572			Cell Phone: 717.324.6572		
Email: fcampagne@yorkcity.org			Email: fcampagne@yorkcity.org		
VIOLATIONS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Sample Results					
Taking the Sand Filters off-line is in violation of Part B.I.E of your NPDES Permit; Failure to properly operate and maintain all facilities which are installed or used to achieve compliance					
Recommendations: -The date the sand filters were taken off-line -List of 2018 and 2019 Bypass discharges from Outfall 001 -Current bypass pump capacity and proposed replacement screw pump capacity -Results from the 2018 I&I study -List of all planned upgrades and maintenance/repair along with associated implementation timeframes					
Person Interviewed: Frankie Campagne	Date: 5/29/19	Inspector: Austen Randecker	Date: 5/29/19		
Signature:	Phone No.: 717.845.2794	Inspector Signature: 	Phone No.: 717.503.7121		
Title: General Manager		Title: Water Quality Specialist			
Email: fcampagne@yorkcity.org		Email: arandecker@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/or review of Department records.					



SEWAGE COMPLIANCE INSPECTION REPORT

Comments

A routine/partial inspection was completed by the Department's Clean Water Program today, 05/29/2019. In attendance for the inspection were Austen Randecker (Water Quality Specialist) and Erick Ammon (Environmental Protection Compliance Specialist) from DEP. The inspection was conducted together with EPA. Steve Maslowski (NPDES Section) and Kaitlin McLaughlin (NPDES Section) accompanied us on the joint inspection. Kettie Rupnik (Environmental Scientist) and Jake Albright (Sr. Environmental Scientist) from PG Environmental, EPA consultants, accompanied EPA on the inspection. Various attendees on-site for York City and York City Sewer Authority (meeting Sign-In Sheet attached).

The inspection began at the Headworks section of the treatment facility. Influent passes through 2 mechanical bar screens, 1 bar screen (right side when facing direction of flow) online during the inspection before entering the grit removal process. 1 bar screen (left side) was offline for repair/replacement of gate valves. Grit removal appeared to be online and operational. Flow passes through a flume and influent flow is measured. Influent is sent to 5 primary clarifiers, #1, #3, and #5 were not in service during the inspection for repair/replacement of chain & flight skimmer systems. Primary clarifier effluent is split between train 2 and 3. ~30% flow to Train #2 and ~70% flow to Train #3.

Train #2 is comprised of 2 separate passes of treatment. Both passes were online during inspection. Each pass comprises: two anaerobic tanks, two anoxic tanks, and four aeration tanks. The mixed liquor in the aeration tanks appeared to be a chocolate brown color with earthy odor and tan foam accumulation on surface. Flow from the aeration tanks combines and is fed into Train #2 secondary clarifiers. Train #2 has 3 secondary clarifiers, and all were online during the inspection. Scum layer on the secondary clarifiers were observed. During the inspection it was noted that a scum pump motor was malfunctioning. All treatment units were online on Train #2 during inspection. Secondary clarifier effluent is sent to 3 Screw lift pumps before combining with Train #3 effluent and entering the sand filter building. 1 screw lift pump was online, 1 screw lift pump was out for repair/rebuild, and the 3rd was operational (offline during inspection) but was not operating at its full capacity. 2 bypass pumping units were in place at the base of the screw pumps to send flow to the sand filter units. During periods of increased flow, the bypass pumps could be used to bypass the screw pumps and send secondary clarifier effluent from Train #2 to the Sand Filter building.

Train #3 is comprised of 3 separate passes of treatment. 2 of the 3 passes were online during the inspection. Each pass is comprised of: two anaerobic tanks, two anoxic tanks, and four aeration tanks. Influent to Train #3 is pumped from the primary effluent pumps and the raw sewage pumps. All treatment units were online in 2 of the online passes. The mixed liquor was a chocolate brown color and there was an accumulation of tan foam on the surface. Flow from the aeration tanks is combined in the mixing tanks and is fed into Train #3 secondary clarifiers. Train #3 has 3 secondary clarifiers, all online during the inspection. The effluent on the surface of the clarifiers appeared clear and there was minimal scum. Secondary clarifier effluent from Train #3 is combined with secondary clarifier effluent from Train #2 and is sent to the Filter Building.

The Filter Building consists of 5 sand filters. At the time of the inspection, the sand filters were not fully operational, allowing partially treated effluent to discharge over the filter overflows to the UV disinfection units. From the Filter Building effluent is sent to the UV building for disinfection. The UV Units appeared to be online and operational. Effluent leaving the UV building appeared clear. Effluent flows over an effluent cascade aeration system before entering Codorus Creek at Outfall 002.

Outfall 001 is permitted to be utilized as a bypass when flows are 53 MGD or greater. Outfall 001 comprises of ~1 MGD of groundwater on a regular basis, stormwater runoff during rain events, and secondary clarifier effluent during bypass events from Train #2. It was mentioned during the inspection that Train #2 is bypassed at flows less than 53 MGD, to prevent solids from washing out and maintaining/preserving the BNR process. When a bypass occurs from Outfall 001, an automated Chlorine dispensing unit is to be used for disinfection. During the inspection the automated Chlorine dispensing unit was out of service and Chlorine was manually dispensed during 001 bypass events.



SEWAGE COMPLIANCE INSPECTION REPORT

Treatment Process Units (NPDES Permit Part B / WQM Permit)				
Treatment Units	Total	On-Line	Inoperable	Date Inoperable / Expected Date Return to Service / Comments
Bar Screen	2	1	0	
Grit Removal	2	2		
Primary Clarifiers	5	2	3	
Train 2				
Anaerobic tank	2	2		
Anoxic Tank	2	2		
Aeration Tank	6	6		
Mixed zone	2	2		
Secondary Clarifier	3	3		
Screw lift Pumps	3	1	1	See comments section
Train 3				
Anaerobic Tank	3	2	0	
Anoxic Tank	3	2	0	
Aeration Tank	9	6	0	
Mixing Zone	3	2	0	
Secondary Clarifier	3	3		
Sand Filter	5	0	all	See comments section
UV	3	1	0	
O&M Manuals available for major pieces of equipment: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Comments:				
Chemical Additions:				



KATHERMAN & PERRY

ATTORNEYS AT LAW
345 EAST MARKET STREET
YORK, PENNSYLVANIA 17403
(717) 854-5124
FAX 843-2590

J. ROBERT KATHERMAN
RONALD PERRY
STACEY R. MACNEAL
JAYNE R. KATHERMAN

August 1, 2019

VIA ELECTRONIC MAIL
arandecker@pa.gov

Austen Randecker
Clean Water Program
Pennsylvania Department of Environmental Protection
Southcentral Regional Office
900 Elmerton Avenue
Harrisburg, PA 17110-8200

Re: York City Wastewater Treatment Plant
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Randecker:

I am the Solicitor for the York City Sewer Authority. I received the Notice of Violation dated July 9, 2019 for the above permit on July 29, 2019.

First, I would like to clarify that the tertiary treatment sand filters at the York City Wastewater Treatment Plant were not and have not been taken "offline". The filters are not currently performing at their intended filtration functionality; however, they are not being intentionally bypassed nor have they been placed offline.

The Authority is in the process of replacing the filter media to restore the system to full functionality. The Authority's Engineer was provided Notice to Proceed to begin the design on May 16, 2018 and submitted a Part II Permitting Application to Pennsylvania Department of Environmental Protection on February 25, 2019. Initial comments were received from PaDEP on July 22, 2019, and the Engineer anticipates responding to those promptly. If the Permit is secured prior to August 2019, the Authority expects to advertise the project for bid shortly thereafter with an estimated Notice to Proceed being issued by December 1, 2019. The project is expected to be a one-year contract with substantial completion by December 1, 2020.

As was also noted during the May 29, 2019 inspection, replacement of two of the three screw pumps at the Plant is in process. The screw pumps being replaced each had a hydraulic capacity of 7.5 mgd. The new pumps each have a hydraulic capacity of 7.9 mgd. As of the date of this letter, the first screw pump has been replaced and placed into service. The contractor is

Austen Randecker
August 1, 2019
Page Two

currently working on replacement of the second screw pump. After its replacement, repair and maintenance work will be performed on the third screw pump. With the two new screw pumps, the hydraulic capacity will be increased from 22.5 mgd to 23.3 mgd.

Additionally, repairs and upgrades to the primary clarifier scum removal system are in process. The Authority's Engineer was provided Notice to Proceed for design of primary clarifier upgrades on April 17, 2019. The project is expected to be advertised for bids in August 2019, with bids being received in September 2019, and Notice to Proceed for the contractor by October 1, 2019. The project is expected to be a six-month contract with substantial completion by April 1, 2020.

Regarding infiltration and inflow in the collection system, the Authority, which is only responsible for Authority-owned interceptors, has authorized its Engineer to begin its recurring five-year interceptor evaluation. The first step in this will be to review and analyze flowmeter data recently obtained by the City of York.

The last interceptor evaluation, completed in 2014, identified three potential interceptor projects. The highest priority project is the Codorus Creek Interceptor, which, while in good condition, has significant debris settled in portions of the pipe. The Authority has advertised for a contractor for cleaning of this interceptor, and bids are expected to be received on August 8, 2019, with the Notice to Proceed expected by mid-September 2019. The project is a 90-day contract, and substantial completion is expected by mid-December 2019. The Authority continues to evaluate the condition and future needs of its Poorhouse Run and Prospect Street Interceptors as well.

The City of York also recently completed a substantial I&I removal project in its Fireside District. Other connected municipalities, including York Township, Manchester Township, Spring Garden Township, West Manchester Township, and York Water Company on behalf of West York Borough, have reported a variety of ongoing I&I reduction projects.

As requested in your correspondence, enclosed please find a list of the 2018 and 2019 bypass discharges from Outfall 001.

If you have any questions, please contact me.

Very truly yours,
KATHERMAN & PERRY



Stacey R. MacNeal

SRM/rmk

Enclosures

cc: York City Sewer Authority (w/ enc.)
Paul Gross, P.E. (w/ enc.)
Frankie Campagne (w/ enc.)

001 BYPASS EVENTS	
DATE	FLOW (MGD)
7/23/2018	4.660
7/24/2018	15.190
7/25/2018	24.710
7/26/2018	14.400
8/4/2018	10.590
9/9/2018	0.570
9/10/2018	0.420
11/24/2018	0.594
11/25/2018	0.099
3/21/2019	3.200
3/22/2019	4.890
TOTAL	79.323



J. ROBERT KATHERMAN
RONALD PERRY
STACEY R. MACNEAL
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KATHERMAN & PERRY

ATTORNEYS AT LAW
345 EAST MARKET STREET
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August 1, 2019

VIA ELECTRONIC MAIL

arandecker@pa.gov

Austen Randecker
Clean Water Program
Pennsylvania Department of Environmental Protection
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900 Elmerton Avenue
Harrisburg, PA 17110-8200

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Austen Randecker
August 1, 2019
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KATHERMAN & PERRY



Stacey R. MacNeal

SRM/rnk

Enclosures

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9/10/2018	0.420
11/24/2018	0.594
11/25/2018	0.099
3/21/2019	3.200
3/22/2019	4.890
TOTAL	79.323



RECEIVED
SEP 06 2019

BY:

September 4, 2019

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 9171 9690 0935 0230 7530 01

Frankie Campagne
York City WWTP
1701 Black Bridge Road
York, PA 17402

Re: York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Campagne:

On August 14 and 15, 2019, the Department of Environmental Protection (Department) conducted an inspection of the York City Wastewater Treatment Plant. During the inspection the following violations were noted:

Unauthorized discharge of foam or substance that produces an observed change in the color, taste, odor, or turbidity of the receiving water is a violation of Part A.1.d of your NPDES Permit.

Failure to immediately notify the Department of an incident that causes or threatens to cause pollution is a violation of Chapter 91.33 of 25 PA Code and your NPDES Permit.

Please submit a written report to the Department within 15 days of receiving this NOV explaining the cause of the violations outlined above, all remediation actions conducted, including a specific timeline of events, along with measures taken to prevent future violations. In addition, please include all sampling results taken on and between 8/12/19 and 8/19/19.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

Mr. Frankie Campagne

- 2 -

September 3, 2019

If you have any questions, please contact me at 717.503.7121 or arandecker@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Austen Randecker".

Austen Randecker
Clean Water Program

Enclosures

cc Stacey R. MacNeal, Katherman & Perry, Attorneys at Law



SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026263	Mo/Day/Year 8/14-15/2019	Entry Time 10:15	Exit Time	Inspection Type INCDT	eFACTS Inspection ID
Facility Name: York City WWTP			Permittee Name: York City Sewer Authority		
Physical Location/Directions: 1701 Black Bridge Road				Permit Expiration Date: 08/31/2022	
Municipality: Manchester Township		County: York		Permit Renewal Application Due: 180 days prior to expiration	
Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor		Treatment Process: <input type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon <input type="checkbox"/> Other:			
Design Flow: 26 MGD		Responsible Official: Frankie Campagne Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Operator Name: Frankie Campagne Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Permittee 345 East Market Street Address: York, PA 17403		Client ID: 336338 License Expiration Date: 6/30/2020 Class-Subclass(es): A,E-1,4 Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Business Phone: 717.845.2794 Cell Phone: 717.324.6572 Email: fcampagne@yorkcity.org		Business Phone: 717.845.2794 Cell Phone: 717.324.6572 Email: fcampagne@yorkcity.org			
24-Hour Emergency Contact Person / Phone / Email: Frankie Campagne 717.324.6572					
VIOLATIONS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input checked="" type="checkbox"/> Pending Sample Results					
<p>Unauthorized discharge of foam or substance that produces an observed change in the color, taste, odor, or turbidity of the receiving water is a violation of Part A.1.d of your NPDES Permit.</p> <p>Failure to immediately notify the Department of an incident that causes or threatens to cause pollution is a violation of Chapter 91.33 of 25 PA Code and your NPDES Permit.</p>					
<p>Recommendations: Please submit a written report to the Department within 15 days of receiving this report explaining the cause of the violations outlined above, all remediation actions conducted, including a specific timeline of events, along with the measures taken to prevent future violations. In addition, please include all sampling results taken on and between 8/12/19 and 8/19/19.</p>					
Person Interviewed: Frankie Campagne		Date: 8/14/19		Inspector: Austen Randecker	
Signature:		Phone No.: 717.845.2794		Date: 8/14/19	
		Inspector Signature: 		Phone No.: 717.503.7121	
Title: General Manager			Title: Water Quality Specialist		
Email: fcampagne@yorkcity.org			Email: arandecker@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/or review of Department records.					



SEWAGE COMPLIANCE INSPECTION REPORT

Comments

An Incident inspection was conducted over a two-day period from August 14-15 2019 by the Department's Clean Water Program. In attendance for the inspection was Austen Randecker (Water Quality Specialist), Ashley Chong (Environmental Trainee), and Shawn Fassl (Environmental Trainee). We were met on-site by Frankie Campagne (General Manager), Veronica Chavez (Pretreatment/Chapter 94/Compliance Manager), Joseph Concino (Chief Chemist), and Sarah Larouche (Chemist & QA Officer) who accompanied us on the inspection and details of the incident.

According to Mr. Campagne, foam was first noted in the headworks of the plant around 12:00 on 08/13/2019. Veronica Chavez identified foam in the headworks around 12:45 and started an investigation as to where the foam was originating from. Between 15:30 – 16:00 on 08/13/2019 Ms. Chavez had pinpointed a location where she believed the foam was coming from.

Foam was contained within the treatment plant on 08/13/2019 and no foam was being discharged into Codorus Creek.

On the morning of 08/14/2019 foam was observed discharging from Outfall 002.

Mr. Campagne notified the 24-hour emergency response # at 08:14 on 08/14/2019 that foam was being discharged to Codorus Creek.

During the Department's inspection on 08/14 foam was identified throughout the treatment facility. Light foaming was occurring at the primary clarifiers and pre-aeration. Foam was identified in Train #2 aeration tanks. There was no observable foam in the secondary clarifiers associated with Train #2. Foam was observed overflowing the screw pumps in Train #2. Thick foam was observed at the effluent cascade and in Codorus Creek for > 500 feet downstream of Outfall 002. The foam was thick, billowy, and white. See Photos on page 3 and 4.

Light foaming was also observed at the riffle on the downstream side of RT 24 (N Sherman St Ext) near Springettsbury's WWTP.

Foam was observed in Train #3 influent splitter box.

A Grab sample was collected from the effluent cascade at Outfall 002 for daily field permit parameters. Results were within permit limits and yielded: pH: 7.06 SU, Dissolved Oxygen: 7.99 mg/l, and Temperature: 25.1 degrees Celsius. Samples were also collected for laboratory analysis.

The Department arrived to York City's STP on 08/15/2019 at 10:30 for a follow-up inspection and noted the following: No foam was observed coming into the plant or in the headworks. No foam was visible in the pre-aeration or primary clarifier. Some large tan/white foam bubbled were observed at the Train 2 and 3 diversion area. Train 2 pass 1 was online during the inspection. There was a light white foam accumulation as well as biological foam accumulation in the aeration basins associated with Train 2. No foam was visible on the secondary clarifiers associated to Train 2. The clarifiers appeared slightly cloudy. There was foam accumulation in the Train 2 screw pumping area. The sand filter building was not observed. There was a significant accumulation of billowy white foam in the post UV basin. Foam was present at the effluent cascade and continued downstream in Codorus Creek for approximately 400 feet before it dissipated. See photos on page 4

3 dead fish were observed, 2 of which were White Suckers and one unidentified small minnow species, downstream of Outfall 002. An alive snapping turtle was also observed.



SEWAGE COMPLIANCE INSPECTION REPORT

Effluent / Receiving Water Evaluation					
Outfall Number(s): 002		Stream Name: Codorus Creek			
DEP Collector #: 2660-030 Sample Date/Time: 08/14/2019 @ 11:38 Sample Location: Effluent cascade Effluent appeared clear with excessive foam	Field Measurements:		Upstream	Outfall	Downstream
	Flow				MGD
	pH			7.06	S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen			7.99	mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature			25.1	° C
Upstream Observations:		Codorus Creek appeared clear			
<input type="checkbox"/> Not Observed					
Outfall Observations:		Effluent had an excessive amount of white, billowy, thick foam			
<input type="checkbox"/> Not Observed					
Downstream Observations:		Codorus Creek was mostly covered with a thick white foam			
<input type="checkbox"/> Not Observed					
Outfall Number(s):		Stream Name:			
DEP Collector #: Sample Date/Time: Sample Location:	Field Measurements:		Upstream	Outfall	Downstream
	Flow				MGD
	pH				S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen				mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature				°
Upstream Observations:					
<input type="checkbox"/> Not Observed					
Outfall Observations:					
<input type="checkbox"/> Not Observed					
Downstream Observations:					
<input type="checkbox"/> Not Observed					
Outfall Number(s):		Stream Name:			
DEP Collector #: Sample Date/Time: Sample Location:	Field Measurements:		Upstream	Outfall	Downstream
	Flow				MGD
	pH				S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen				mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature				°
Upstream Observations:					
<input type="checkbox"/> Not Observed					
Outfall Observations:					
<input type="checkbox"/> Not Observed					
Downstream Observations:					
<input type="checkbox"/> Not Observed					

SEWAGE COMPLIANCE INSPECTION REPORT

Photographs



Photo taken by Austen Randecker - Outfall 002 effluent cascade on 08/14/2019



Photo taken by Austen Randecker - Codorus Creek downstream of Outfall 002 on 08/14/2019

SEWAGE COMPLIANCE INSPECTION REPORT

Photographs

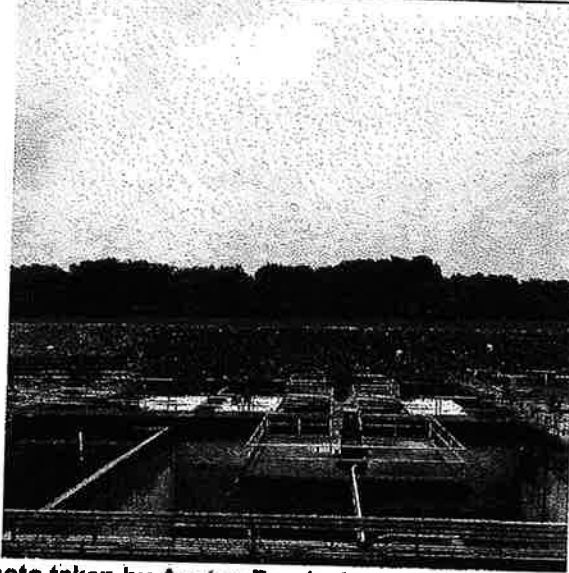


Photo taken by Austen Randecker – Train 2 aeration tank with foam on 08/14/2019



Photo taken by Austen Randecker – Train 2 screw pumps with foaming 08/14/2019

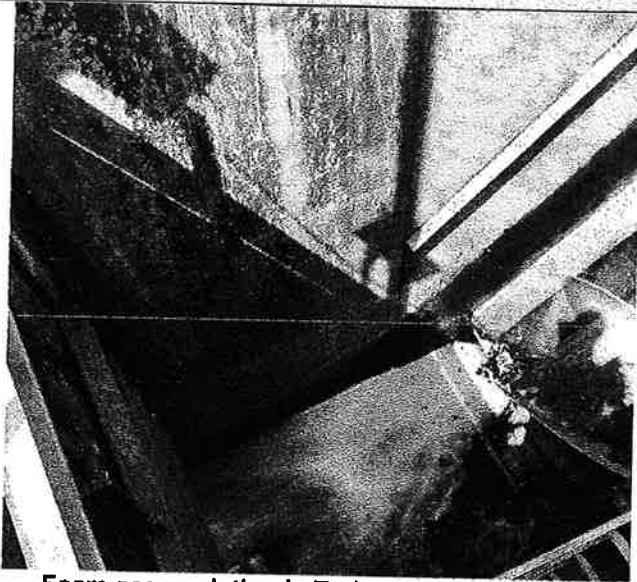


Photo taken by Ashley Chong – Codorus Creek at N Sherman St Ext with foaming on left descending bank on 08/14/2019

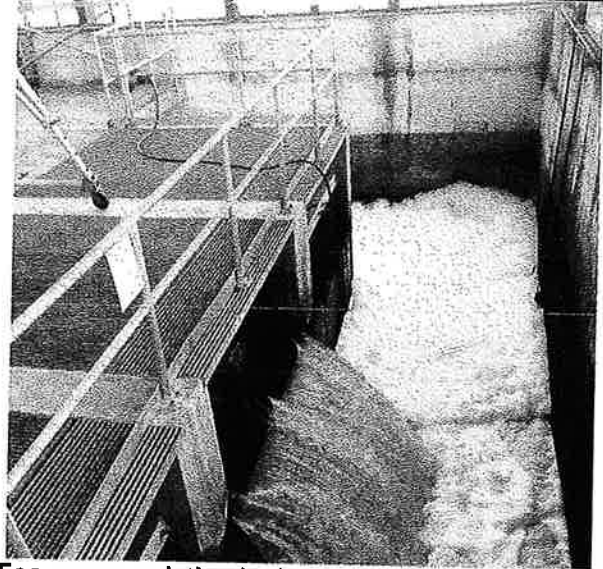


Photo taken by Austen Randecker – Aeration basin in Train #2 with foam still present on 08/15/2019

Photographs



Foam accumulation in Train 2 screw pump on 08/15/2019



Foam accumulation in the post UV system tank on 08/15/2019



Foam in Codorus Creek below Outfall 002 on 08/15/2019



Codorus Creek ~200 feet downstream Outfall 002 on 08/15/2019. Dead White Sucker Observed

Photos taken by Austen Randecker on 08/15/2019



J. ROBERT KATHERMAN
RONALD PERRY
STACEY R. MACNEAL
JAYNE R. KATHERMAN

KATHERMAN & PERRY

ATTORNEYS AT LAW
345 EAST MARKET STREET
YORK, PENNSYLVANIA 17403
(717) 854-5124
FAX 843-2590

September 19, 2019

VIA FEDERAL EXPRESS

Austen Randecker
Clean Water Program
Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Re: York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Mr. Randecker:

Please be advised that I am the Solicitor for the York City Sewer Authority, which received on September 6, 2019 your Notice of Violation dated September 4, 2019.

The substance discharged through the City of York's sewer system was detected at the wastewater treatment plant shortly after noon on August 13, 2019. It is worth mentioning that from time-to-time, the Plant experiences whiteish substances, turquoise coloration, oily sheen, yellowish and dirty colors in the influent. The standard operating procedure is to monitor Plant performance and determine its impact.

On August 13, 2019 at approximately 12:30 p.m. a wastewater treatment plant operator observed foam entering the headworks from the Lower Codorus Creek interceptor. By 12:45 p.m., all departments had been mobilized to collect influent samples for analyses in order determine the origin and composition of the substance. The standing orders by the Plant Manager were to continue monitoring the process and plant performance and report any significant changes.

Pretreatment program staff was notified immediately and arrived at the headworks. The source of the foamy substance was back-tracked and discovered at 6:02 p.m., just over five hours after the initial observation of the substance entering the treatment plant. Staff entered the facility, and a Cease and Desist Order was issued. The source of discharge was an industry permitted under the pretreatment program as a Centralized Waste Treatment facility under 40

Austen Randecker
September 19, 2019
Page Two

CFR 437.15, Subpart A-Metals Treatment and Recovery. The discharge is in violation of the facility's industrial wastewater discharge permit issued September 21, 2018 and effective October 1, 2019 through September 30, 2021. The discharge is also in violation of the City of York Code, Article 931, Sanitary Sewers, most notably, and not limited to, §931.02.b.21 that prohibits the discharge of substances causing foam in the treatment plant's effluent.

By the morning of August 14, 2019, foam was present in Plant effluent and at every location of rapid mixing in the process. After observing this as unusual Plant behavior, the Plant Manager notified DEP of the event at 8:02 a.m.

Pretreatment staff met with the discharging industry as a follow-up on September 14, 2019, and again with PADEP staff on September 15, 2019. The discharging industry submitted the spill/upset form required by 40 CFR 403.16.a and York City Code 931.03.n as well as requested laboratory analysis results.

Pretreatment staff are compiling information in preparation for submitting enforcement actions in accordance with the pretreatment program's Enforcement Response Plan approved by USEPA on December 20, 2013. In addition, the discharging industry will be required to submit a slug control plan to prevent future uncharacteristic discharges (ref: York City Code §931.03.o, 40 CFR 403.08.f.2.vi). Such plan will become part of the discharging industry's industrial wastewater discharge permit. Pretreatment staff also contacted USEPA and reported the event to Agency for possible civil or criminal investigation.

Enclosed are an outline of the activities of the Plant's certified laboratory staff surrounding the incident, analytical reports for grab samples collected by Plant staff on August 13, 2019 and by DEP on August 14, 2019, and the results of the Plant's total Kjeldahl Nitrogen analyses for August 2019.

Very truly yours,
KATHERMAN & PERRY



Stacey R. MacNeal

SRM/rnk

Enclosures

cc: Frankie Campagne, Plant Manager (via email, w/ enc.)
Paul E. Gross, P.E. (via email, w/ enc.)
YCSA (via email, w/ enc.)

Report on sampling etc. during the foam incident from the laboratory perspective:

On 8/13/19 around 1245 lab staff were advised by FAC that there was a foamy layer in the primary channel and that HL needed bottles to collect some samples. He was given bottles and subsequently returned to the lab at 1258 with a bottle of primarily the water from the channel and a second in which he had attempted to collect the actual foam (but which consisted of primarily water upon arrival in the lab). The sample was tested for temperature and pH upon receipt as per the lab's standard procedure and neither were remarkable (23.6C, 7.21su). Two additional bottles were provided with H₂SO₄ and HNO₃ to grab the acidified sample components that could be used for testing other parameters such as ammonia, phosphates, and metals if needed. A chain of custody is available showing the sample collection and initial assessment of pH and temperature. After consultation with FAC about the initial sample results, lab staff were told to refrigerate all the bottles overnight until a decision was made about what (if any) analysis was required. As of 1530, there was visible foam in the BNR tanks, but the DO's in the tanks were close to their set points.

On 8/14/19 around 0800, the lab staff were informed that the sample from the prior day was to be analyzed for all normal analytes (TSS, BOD, NH₃, PO₄, and NO_x) along with the other process samples from that date. Phosphate analysis failed the first day since the sample was greater than the expected to dilution, so it was scheduled to be rerun the following day (8/15/19). A lab report is attached summarizing the results of all parameters that were completed for this sample. Metals analysis was completed by an outside lab and the results are attached. (Please note that the outside lab misread the word slug as sludge, so it is identified incorrectly on their report.)

On 8/14/19 at about 1040 that day MIPP staff brought in a composite sample (collected between 0812 on 08/13/19 to 0907 on 08/14/19) from one of the industries that they monitor which was atypical in color, smell, and apparent turbidity. Some dilution factors were adjusted to try to account for expected differences from the usual composition of this industries wastewater. On 8/15/19 while some lab staff were meeting with representatives from DEP, other lab staff were completing the digestion process for the PO₄ analysis. Upon opening the door of the autoclave used for digestion, the odor was so strong that the lab staff were forced to evacuate the lab temporarily. An email is attached regarding this incident, written by the Chemist who was performing the analysis. After that, this sample was sent to an outside lab for phosphate and ammonia analysis (metals analysis had already been sent out. The only results obtained by the lab were Temperature (17.7C), TSS (49 g/L), and BOD (>4500 mg/L). pH was also measured in order to prepare the sample for BOD analysis (8.90su). A copy of the bench sheet is attached with the results obtained by our lab, and MIPP will have a copy of our lab report for this sample as well.

All lab results from 8/12/19 to 8/19/19 were requested thus a copy of the daily summary report for those dates is included as an attachment. We do not formally report these samples other than on our DMR, so there are no formal reports for any of these samples. This report contains all process and regulatory testing performed by lab staff for these dates.

Sarah Larouche

Chemist & QA Officer

September 12, 2019

pH Analysis

Date 8/13/19 Analyst ffdLast pH Meter Calibration: Date 8/13/19Time 0659 Slope 97.1

Sample ID	Time collected	pH	Time analyzed
Primary Grab from 8/13/19	1252	7.21	1302
DUP			

RPD = N/A =

Remember:

Samples must be analyzed within 15 minutes of collection.
 Analyze a pH 4 buffer to verify calibration after initial
 calibration, after every 10 samples & at the end of the run.
 Record date, time, initials, # samples on the pH usage log.

City of York Wastewater Treatment Plant

1701 Black Bridge Road - York, PA 17402

PA DEP Lab ID# 67-00645

Laboratory Analysis Summary

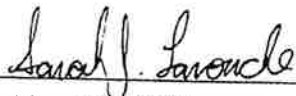
Permit No: PA0026263
 Permittee: City of York WWTP
 Primary Effluent Grab from Foam Incident
 Sample Event Date: 08/13/19

Sampled By: HL
 Sample ID: PriEff 08/13/19 grab

Client: City of York WWTP
 1701 Black Bridge Rd
 York, PA 17402

Parameter	Result	Units	Reporting Limit	Collected		Analyzed		Method	Flag
				Date	Time	Date	Time		
pH	7.21	s.u.	0 to 14	08/13/19	12:52	08/13/19	13:02	SM 4500 H' B	*note*
Temperature	23.6	°C	-5 to 45	08/13/19	12:52	08/13/19	13:00	SM 2550 B	
Total Suspended Solids	315	mg/L	1	08/13/19	12:52	08/15/19	8:04	SM 2540 D	
Ammonia (as N)	31.6	mg/L	0.1	08/13/19	12:52	08/14/19	11:04	SM4500 NH3 B/F	
Nitrite+Nitrate	3.32	mg/L	0.2	08/13/19	12:52	08/14/19	11:54	SM 4500 NO3 H	
total Phosphorus (as P)	10.1	mg/L	0.1	08/13/19	12:52	08/15/19	11:21	SM 4500 P B/E	
Biochemical Oxygen Demand	1023	mg/L	2	08/13/19	12:52	08/14/19	12:03	SM 5210 B	

*Ammonia sample was not distilled since this was not a reportable sample.



Sarah J. Larouche, Chemist, QA Officer
 City of York Wastewater Treatment Plant

Date 9/12/19

All analyses comply with the methodology requirements of 40 CFR Part 136.
 A complete listing of acronyms and abbreviations used by the City of York Wastewater Treatment Plant Laboratory is located on the back of this page.
 BOD dates and times documented are those corresponding with setup of analysis, all others correspond with analysis completion.
 All times are in military time.



Date of Issue: 09/16/2019 01:36:46
DEP Bureau of Laboratories - Harrisburg
 P.O. Box 1467
 2575 Interstate Drive
 Harrisburg, PA 17105-1467
Contact Phone Number: (717) 346-7200

NELAP - accredited by
 NJ DEP - Laboratory Number: PA059
 PA DEP LAP - DEP Lab ID: 22-00223

Sample ID: 2660 030 **Date Collected:** 08/14/2019 11:38:00 AM **Lab Sample ID:** B2019007987 **Status:** Completed
Analytical Report For
Water Quality Protection

Name of Sample Collector: Austen Randecker
Date Received: 08/15/2019

County: York
Municipality: York

State:
 YORK CITY STP
 1701 BLACK BRIDGE RD
 YORK PA. 174021911

Facility/Permit ID: PA0026263 **FIX ID:** 480734
Facility: YORK CITY STP
Sub-Facility: 002 **FIX ID:** 349264
Name: OUTFALL 002 - CODORUS CR

Sample Medium: Effluent
Sample Medium Type: Effluent And Influent

Location: NOT INDICATED
Reason: Routine Sampling
Project: NOT INDICATED
Standard Analysis: B002
Matrix: Water

Field Tests	
pH	7.06 pH units
Temperature	25.1 C

Analytical Report For
Water Quality Protection

Sample ID: 2660 030

Date Collected: 08/14/2019 11:38:00 AM

Lab Sample ID: B2019007987

Status: Completed

Field Tests

Dissolved Oxygen	7.99	mg/L
------------------	------	------

Stream Condition:

Sample Comment: a sample was collected during an incident at the York City STP. A likely surfactant had entered the treatment facility.
Sample Standard Comment: Holding time exceeded

Appearance: effluent appeared mostly clear with thick, white, billowy fo

Test Codes / CAS # - Description	Reported Results	Date And Time Analyzed	Approved by	Test Method
31616 Fecal Coliform	>60000 /100mL	08/15/2019 09:00 AM	HEBLOSS	SM 9222D

The results of the analyses provided in this laboratory report relate only to the sample(s) identified therein. Unless otherwise noted, the results presented on this laboratory report meet all requirements of the 2009 TNI standard. Sample was in acceptable condition when received by the Laboratory. Any exceptions are noted in the report.

* denotes tests that the laboratory is not accredited for

U - Indicates analysis was performed for the test but it was not detected. The sample quantitation limit is reported.

J - Indicates an estimated value, reported between Reporting Limit (RL) and Minimum Detection Limit (MDL)

Taru Upadhyay, Technical Director, Bureau of Laboratories



Date of Issue: 09/16/2019 01:36:51
DEP Bureau of Laboratories - Harrisburg
 P.O. Box 1467
 2575 Interstate Drive
 Harrisburg, PA 17105-1467
Contact Phone Number: (717) 346-7200

NELAP - accredited by
 NJ DEP - Laboratory Number: PA059
 PA DEP LAP - DEP Lab ID: 22-00223

Sample ID: 2660 030 **Date Collected:** 08/14/2019 11:38:00 AM **Analytical Report For**
 Water Quality Protection **Lab Sample ID:** I2019020412 **Status:** Completed

Name of Sample Collector: Austen Randecker
Date Received: 08/15/2019

County: York
Municipality: York

State:

YORK CITY STP
 1701 BLACK BRIDGE RD
 YORK PA. 174021911

Facility/Permit ID: PA0026263

Facility: YORK CITY STP

Sub-Facility: 002

FIX ID: 480734

FIX ID: 349264

Name: OUTFALL 002 - CODORUS CR

Sample Medium: Effluent

Sample Medium Type: Effluent And Influent

Location: NOT INDICATED

Reason: Routine Sampling

Project: NOT INDICATED

Standard Analysis: 077

Matrix: Water

Field Tests	
pH	7.06 pH units
Temperature	25.1 C

Analytical Report For
Water Quality Protection

Sample ID: 2660 030

Date Collected: 08/14/2019 11:38:00 AM

Lab Sample ID: I2019020412

Status: Completed

Field Tests

Dissolved Oxygen	7.99	mg/L
------------------	------	------

Stream Condition:

Sample Comment: a sample was collected during an incident at the York City STP. A likely surfactant had entered the treatment facility.
Appearance: effluent appeared mostly clear with thick, white, billowy fo

Test Codes / CAS # - Description	Reported Results	Date And Time Analyzed	Approved by	Test Method
00410 ALKALINITY AS CaCO3 @ pH 4.5	178.6 mg/L	08/15/2019 03:37 PM	MTUZINSKI	SM 2320B
00610A AMMONIA TOTAL AS NITROGEN	6.90 mg/L	09/05/2019 07:50 PM	CRADEK	EPA 350.1
** Comment ** Answer Rechecked By Analyst				
00314 CARBONACEOUS BIOCHEMICAL OXYGEN DEMAND 5 DAY	129.00 mg/L	08/15/2019 11:35 AM	JRONEMUS	SM 5210B
** Comment ** < 1.0 mg/L final DO				
00556H OIL AND GREASE METHOD 1664 (HEXANE)	<5.0 mg/L (U)	09/03/2019 12:00 AM	WBUCK	EPA 1664A
00625A Total Kjeldahl Nitrogen	9.61 mg/L	08/22/2019 05:25 PM	TVOROBAYCH	EPA 351.2
00620A Total Nitrate Nitrogen-Colorimetric	0.20 mg/L	08/15/2019 11:16 AM	TBEAR	EPA 353.2
00615A Total Nitrite Nitrogen-Colorimetric	0.19 mg/L	08/15/2019 11:16 AM	TBEAR	EPA 353.2
00665A Total Phosphorus as P	17.021 mg/L	08/20/2019 10:22 AM	LBENT	EPA 365.1
00530V TOTAL SUSPENDED SOLIDS	21 mg/L	08/15/2019 12:00 AM	DEVBARRY	USGS I-3765

The results of the analyses provided in this laboratory report relate only to the sample(s) identified therein. Unless otherwise noted, the results presented on this laboratory report meet all requirements of the 2009 TNI standard. Sample was in acceptable condition when received by the Laboratory. Any exceptions are noted in the report.
* denotes tests that the laboratory is not accredited for

U - Indicates analysis was performed for the test but it was not detected. The sample quantitation limit is reported.

J - Indicates an estimated value, reported between Reporting Limit (RL) and Minimum Detection Limit (MDL).

Taru Upadhyay, Technical Director, Bureau of Laboratories

Total Kjeldahl Nitrogen for August 2019
 Date of Analysis: 9/15/19
 Time of Analysis: 1030

Method SM - 4500-NH₃ F
 Analyst Name: ehd

Slope : -58.49 mV

Sample Identification	Digested (X)	Distilled (X)	Dilution Factor	pH >11 (X)	Meter Reading NH ₃ mg/L	Final Result NH ₃ mg/L	%Rec; RPD or Std Lot #	QC passed	Quality Control Criteria (see reverse side for actions)
Calibration Blank			None (:)						
Method Blank	X	X	None (:)	X	0.0523	<1.00		Y/N	Must be less than 1.0 mg/L
QCS (4.0 mg/L)			None (:)	X	0.154	<1.00		Y/N	Must be less than 1.0 mg/L
LCS (10.0 mg/L)	X	X	None (:)	X	4.00	4.00	S-11638	Y/N	Between 3.60 and 4.40 mg/L
1 002 EFF 8/8	X	X	None (:)	X	9.84	9.84	S-11640	Y/N	Between 9.0 and 11.0 mg/L
2 002 EFF 8/10	X	X	None (:)	X	1.86	1.86			
3 002 EFF 8/12	X	X	None (:)	X	1.60	1.60			
4 002 EFF 8/14	X	X	None (:)	X	1.65	1.65			
5 002 EFF 8/18	X	X	None (:)	X	7.11	7.11			
6 002 EFF 8/20	X	X	None (:)	X	1.85	1.85			
7 002 EFF 8/24	X	X	None (:)	X	2.29	2.29			
8 002 EFF 8/28	X	X	None (:)	X	1.62	1.62			
Calibration Blank			None (:)						
QCS (22.0 mg/L)			None (:)	X	0.0485	<1.00		Y/N	Must be less than 1.0 mg/L
9 002 EFF	X	X	None (:)	X	22.1	22.1	S-11637	Y/N	Between 19.8 and 24.2 mg/L
10 002 EFF	X	X	None (:)						
11 RAW INF 8/28	X	X	None (1:2)	X	20.4	40.8			
12			None (:)						
13			None (:)						
14			None (:)						
15			None (:)						
16			None (:)						
DUP 002 EFF 8/28	X	X	None (:)	X	1.72	1.72	RPD= 2.4%	Y/N	Must be within 0 -10 %
SPK	X	X	None (:)	X	11.5	11.5	%Rec= 98%	Y/N	Must be within 90 -110 %
Calibration Blank			None (:)						
QCS (4.00 mg/L)			None (:)	X	0.0645	<1.00		Y/N	Must be less than 1.0 mg/L
			None (:)	X	4.05	4.05		Y/N	Between 3.60 and 4.40 mg/L



The City of York Pennsylvania

101 South George Street ❖ PO Box 509 ❖ York PA 17405

www.yorkcity.org

Honorable C. Kim Bracey, Mayor

*Brent R. Herring
Operations Manager
City of York Wastewater Treatment Plant
1701 Black Bridge Road
York, PA 17402*

August 25, 2017

Erick Ammons
Environmental Compliance Specialist
Clean Water Program
South-central Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Subject: City of York Wastewater Treatment Plant NPDES Permit Number PA0026263
Notice of Violation Letter Dated July 26, 2017

Dear Mr. Ammons:

As a follow-up to your letter of July 26, 2017, the York City Sewer Authority is providing its response to the requested items as follows.

Item Number 1 directed that we provide an Environmental Emergency Response Plan for the York City WWTP. The WWTP has an Emergency Response Plan that is updated annually and last updated in August 2016, of which the table of contents are enclosed as Attachment 1. In reviewing this we determined that there is no specific section addressing non-hazardous wastewater spill management. Attachment 2 is the section that will be added to the Plan. A standard operating procedure for managing such incidents is provided as Attachment 3. Training will be provided to all operators during the month of September on these two items as well as the overall Plan. The WWTP's engineering consultants, Buchart-Horn, has been contracted to update this Plan and is currently doing so.

Item Number 2 directed a timeline for identifying and labeling all drains at the York City WWTP that discharge to the storm water basin. All drains will be identified as being either in-plant drains or directly or indirectly draining to Codorus Creek. This activity will be completed by October 15, 2017.

Item Number 3 directed that a summary of the work completed to pump out and clean the storm water basin be provided. This work was completed by an outside contractor on August 2, 2017. The work consisted of pumping down the tank to the primary influent and cleaning the tank. During this time we assessed the significant groundwater leak as requested and determined that a large concrete pipe to the tank has been compromised and requires repair. We are currently assessing this issue. We also replaced a sump pump in the tank allowing the tank contents to be pumped when so valved back to the process if needed. This tank was placed back in service and automatic control was re-enabled.

Item Number 4 directed that we provide a schedule for repairing the audio/visual alarm systems installed on the plastic centrate holding tanks and connecting the alarm systems to the WWTP SCADA system. The inspection

report also recommended the installation of secondary containment around the centrate tanks. We have evaluated the cost and timeline of being able to accomplish these actions.

In response to this, we are proposing an alternative, discussed with you during the Biosolids Compliance Inspection meeting on August 3, 2017, of rerouting the centrate flow from the centrifuges directly to the outside centrate tanks. We will take the downstairs centrate tanks out of service. Quotes were obtained the purchase order has been approved by the City. The schedule calls for this work to be completed by November 30, 2017.

Thank you for your input and discussion.

Sincerely,

Original signed document sent by USPS

Brent R. Herring
Operations Manager

cc: Frankie Campagne, General Manager
Chaz Green, Director of Public Works
Hidalgo Diaz, Shift Supervisor
Sheena Ripple, Department of Environmental Protection
Kevin Buss, Department of Environmental Protection

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4.2.5 Non-Hazardous Wastewater Spills

Plant drains discharge to points outside the facility (Outfall 001-008), to a storm water collection and conveyance system within the plant for discharge by pumping to Codorus Creek or to treatment processes, or various wastewater system treatment components for further treatment. These drains are being marked with a painted stripe two or more inches in diameter with one of two colors to indicate the ultimate point of discharge.

In the event of a spill inside a building, the operator should contain the spill using sandbags or absorbent pads. Once the spill is contained, the operator should proceed to properly clean the spill and the immediate area, marking the area for caution until it is dry. Wastewater spills can be washed down any inside floor drain, provided that the material will not plug the drain.

All liquid spills outside any buildings must be contained immediately and all yard drains must be protected from the non-hazardous wastewater spill reaching the drain with the use of containment booms, sandbags, covers, absorbent pads, or any combination thereof. As is the case with all spills, a shift supervisor must be notified immediately to determine if what reporting, if any, is to be made and to who. In most cases significant non-hazardous wastewater spills will require reporting to PADEP within four hours.

Should a significant non-hazardous wastewater spill occur and such spill volumes are in locations they do not belong, then the shift supervisor is to call outside contractors for clean-up services to ensure the spill does not reach Codorus Creek. Taking the above actions will ensure that when and if a spill does occur, the spilled material can be handled and disposed of in a safe and appropriate manner.

Management of Non-Hazardous Wastewater Spills
Original Development Date: 08/06/17

Approved: _____
General Manager

Effective Date: 08/15/2017

Date: _____

Management of Non-Hazardous Wastewater Spills SOP OP-012 (Draft)

1.0 Definitions

- 1.1 An incidental spill is a small spill outside of the area where it would normally be located, easily contained and can be cleaned up in a short period of time.
- 1.2 A large spill is one that is not an incidental spill.
- 1.3 A non-hazardous wastewater spill is any spill that contains any amount of wastewater liquid, solids, or both in any stage of treatment.

2.0 Initial Assessment and Communications

- 2.1 A non-hazardous wastewater spill is any spill that contains any amount of wastewater flow or solids.
- 2.2 Non-hazardous wastewater spills on the plant grounds of greater than fifty gallons is to be managed as a non-routine event requiring immediate attention and resources in containment and clean-up.
- 2.3 All staff shall immediately work to contain and clean-up the spill.
- 2.4 A shift supervisor is to be called immediately if one is not on-site. Continue calling in rotation until a shift supervisor is reached.
- 2.5 In the event a shift supervisor is not available immediately, staff is to call the operations manager and/or general manager.
- 2.6 Calls to management and clean-up is to be conducted at the same time by different team members to ensure the issue is immediately addressed.
- 2.7 Chemical spills are handled according to procedures in the Emergency Response Plan.
- 2.8 Notification to the PADEP is required to be made within four hours, which is to be done by a supervisor as soon as the situation is assessed but in no case later than four hours.

3.0 Response Procedure

- 3.1 The four fundamentals in responding to a spill are assessment, notification, containment, and clean-up and not necessarily in that order.
- 3.2 Identify and/or confirm what was spilled.
- 3.3 Assess the area for impacts and determine the flow path of the spilled material.
- 3.4 Determine the source and take steps to stop the flow from the source.
- 3.5 Immediately isolate any drains in the area of the spill or any area the spill may reach that discharge outside the plant with the use of sandbags or other flow control material.
- 3.6 Immediately place the storm water pumps in the OFF position to prevent any pumping to Codorus Creek in the event the material has or may enter a storm drain.
- 3.7 Contain the area and keep unauthorized personnel out.
- 3.8 Wear appropriate PPE in cleaning up the spilled material.
- 3.9 Use the available spill control materials available at multiple locations in the plant such as sandbags, absorbent pads, absorbent granular material, containment booms,
- 3.10 Dispose of collected material properly.



SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026263	Mo/Day/Year 03/18/21	Entry Time 08:45	Exit Time	Inspection Type CEI	eFACTS Inspection ID
Facility Name: York City WWTP			Permittee Name: York City Sewer Authority		
Physical Location/Directions: 1701 Black Bridge Road, York				Permit Expiration Date: August 31, 2022	
Municipality: Manchester Township		County: York		Permit Renewal Application Due: February 28, 2022	
Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor		Treatment Process: <input checked="" type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon			
Design Flow: 26 MGD		<input type="checkbox"/> Other:			
Responsible Official: York City Sewer Authority		Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Title:		Operator Name: Frankie Campagne			
Permittee Address: 345 East Market Street York, PA 17403		Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
		Client ID: 336338 License Expiration Date: 6/30/2023			
		Class-Subclass(es): A,E-1,2,3,4			
		Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Business Phone:		Business Phone: 717-845-2794			
Cell Phone:		Cell Phone: 717-324-6572			
Email:		Email: fcampagne@yorkcity.org			
24-Hour Emergency Contact Person / Phone / Email: Frankie Campagne: 717-324-6572					
VIOLATIONS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> None Identified During Inspection <input checked="" type="checkbox"/> Pending Sample Results					
<p>All treatment plant equipment should be kept in good working order so that it is available for use when needed including mechanical bar screen, grit pumps, SCADA system, centrifuge and sludge digesters.</p>					
Recommendations:					
Copy of report emailed to York City Sewer Authority and Hidalgo Diaz					
Person Interviewed: Hidalgo Diaz		Date: 3/18/21		Inspector: Heather Dock and Erick Ammon	
Signature:		Phone No.:		Date: 3/18/21	
				Inspector Signature: <i>Heather Dock</i>	
				Phone No.: 717-439-5080	
Title: Shift Supervisor			Title: Water Quality Specialist		
Email: HDiaz@yorkcity.org			Email: hdock@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/or review of Department records.					

SEWAGE COMPLIANCE INSPECTION REPORT**Comments**

CEI inspection conducted with York City WWTP staff (York City) and the Department. Present from York City were: Frankie Campagne (Superintendent), Hidalgo Diaz (Shift Supervisor), Joe Concina (Lab Supervisor) and Veronica Chavez (Pretreatment Coordinator). Present from the Department were Heather Dock (Water Quality Specialist) and Erick Ammon (Compliance Specialist), who jointly completed the following inspection report.

The information, specifically staff, contained in this report was accurate at the time of the inspection.

The inspection began with a group meeting. Mr. Campagne acknowledged the upcoming sale of the treatment plant to PA American Water. In addition to the city, the treatment plant serves 7 municipalities and during wet weather, there is a tie-in with Springettsbury Township. The plant receives flow via gravity and the aid of collection system pump stations. York City has one pump station, which serves an industrial park and contributes a minimal amount of flow. The contributing municipalities maintain 20 pump stations.

We discussed wet weather issues at the treatment plant, which is set up with a wet weather bypass. Mr. Campagne and Mr. Diaz explained that the plant operators have to manually make plant adjustments during wet weather as the system is not set up to be automated. Wet weather procedures begin to be implemented when wet weather flows reach 15 MGD but also depend on the type of storm. Additional tanks are put into service with influent flows reach 26 MGD. Average flow for 2020 was 9.95 MGD, which is well within the designed hydraulic capacity of the treatment plant. Mr. Campagne said the flows significantly increase above the design capacity of 26 MGD during wet weather events. The increases occur quickly. The intermunicipal agreements in place don't include collection system maintenance agreements. Ms. Chavez explained that the industrial users contribute a small proportion of flow so wet weather flow restrictions are not implemented. She also said to the best of her knowledge those users were not contributing stormwater to the sanitary sewer system, except one, which was an acceptable condition.

Staffing levels were discussed. There are 13 plant operators with three certified. Some management staff, such as Mr. Campagne and Mr. Cocina also have certification. The plant is staffed 24-hours per day, 7 days per week. Operators work 12 hours shifts. In addition to operations, the plant operates an in-house accredited lab. There is also a separate plant maintenance section, headed by Scott Millard and Collection System crew, headed by Percy Bullock. There are currently 6 maintenance staff, who are focused on repairs rather than preventative maintenance.

Mr. Campagne said they aren't adding a carbon source to aid in nitrogen removal. They are also relying on biological phosphorus removal and not adding any chemical additions.

We discussed recent significant plant repairs and equipment replacement. Bar screen #1 was overhauled in 2020 and bar screen #2 is planned to have the same work completed. This work was contracted out. Three of the VFDs were replaced between the raw and primary effluent pumps.

Completed since the previous inspection were improvements made to the primary clarifiers, which began in spring 2020. There are 8 total clarifiers, with #1-5 used, as needed. The project, which was finished last summer included new chains and flights as well as scum piping. This work was contracted out.

The tertiary disc cloth filter project is nearing completion and the filters have been online for about 6 weeks. There are 4 filters, with a 5th tank available for an additional filter in the future. Two filters are capable of handling the hydraulic capacity of the plant. Filter backwash is set up to return to the plant.

Sludge digester #3 was cleaned in 2020, while #1 was cleaned several years ago. Digester #1 is scheduled for cleaning this year after mechanical issues are resolved.

Some projects that have not been completed but are needed are the replacement of the third screw pump for train #2, which is used to pump flow to the filters. The second transformer for train #3 is failing and needs replaced. The first transformer was replaced within the past few years.

SEWAGE COMPLIANCE INSPECTION REPORT

Wish list projects include upgrading the SCADA system, upgrading the existing UV system, adding UV to outfall 001 and improving the gas production system on the digesters.

Mr. Diaz provided a tour of the treatment facilities. Light rain was falling during the inspection. The following treatment units were inoperable during the inspection: one mechanical bar screen, one grit removal pump and 1 centrifuge.

Prior to the influent chamber, sewage debris was observed on the asphalt. Mr. Diaz explained that this area is the unloading station for the collection system equipment and that the nearby stormwater catch basin is tied directly into the influent.

Influent enters the headworks building after passing through one of two mechanical bar screens. Bar screen #2 was online today. Bar screen #1 was out of service and in need of repair. Both grit removal systems were online, #2 was fully operational, while the grit pump in unit #1 doesn't work so flow is just passing through and the pit is pumped out as needed. This unit has been out of service for about 3 months. Inside the grit removal building, the utility water line feeding the bar screen was leaking. There are two influent flow meters. A magmeter is set up prior to the Springettsbury wet weather line. A Parschall flume with an ultra-sonic sensor is also operable after the grit building. The flow data is transmitted to a website. Mr. Diaz said he is unsure which flowmeter readings are used for DMR reporting. Instantaneous flow after the grit building was about 16 MGD.

Three of 5 primary clarifiers were online today. Mr. Diaz explained that influent BODs are very low (100s), which challenges the activated sludge process. Primary sludge is directed to T20 storage tank.

Primary effluent pumps (x2) have had pump controls/VFDs upgraded within last 2 years. No change in hydraulic capacity. Flow from primary effluent pumps goes to Train #3.

WWTP groundwater pumping system is offline. We generally discussed the monitoring of groundwater I&I into the main bypass and stormwater collection and conveyance pipe (<50") to outfall 001. The facility has had this line televised and significant I&I was noted

BNR train #2 had 1 of 2 passes online (pass #2 to the right facing the direction of forward flow was online). Each pass consists of an anaerobic zone, oxic zones, post anoxic zone and reaeration. Oxic zones are monitored for DO. All mixers and aerators appeared to be operating in the online passes. Mixed liquor had a chocolate brown color.

All three clarifiers for train #2 were online during the inspection. Scum was present on about 25% of the surface of the clarifiers. Some pin flow was present. Train #2 final clarifiers are one of the locations in the WWTP where high flows create a chance of treatment unit overflows to the main bypass to outfall 001. There are two manual gate valves that plant operators place into service to bypass from the Train #2 final clarifiers to outfall 001. The first bypass valve pit is located between the south/ #1 clarifier and the middle/#2 clarifier. The second bypass valve pit is located between the middle/#2 valve pit and the north/#3 clarifier. Operators have placed a refrigerated composite sampler between the #1 and #2 clarifiers to sample the bypass. Bypass chlorination is achieved by manually controlled liquid hypochlorite addition from two totes located at a stormwater catch basin downstream of the two train #2 clarifier bypasses.

One of three train #2 screw lift pumps is currently online. All three are operable and turn on/off based on flow conditions. The #1 (west) & #2 (middle) screw lift pumps have been replaced. The replacement has increased the hydraulic design flow of the treatment unit.

BNR train #3 had 2 of 3 passes online. All mixers and aerators appeared to be operating in the online passes. Mixed liquor had a chocolate brown color. All three final clarifiers were online for train #3 and were producing a clear effluent.

SEWAGE COMPLIANCE INSPECTION REPORT

Two of four cloth media filters were online due to low flows.

One of three UV systems was online based on flow conditions. One unit was being serviced today.

A grab sample was collected from the effluent cascade for lab analysis and was analyzed on-site for daily permit parameters. In-house results for today were: pH: 7.46, DO: 10.12 mg/L.

Biosolids treatment includes digestion, thickening, dewatering and land application under the Department's PAG-08 permit. Wasting occurs continuously and today's rates from the activated sludge process were 30 gpm from train #2 and 60 gpm from train #3. Primary and secondary sludge is directed to tank T20 for storage prior to thickening. One of two gravity belt thickeners was online today. Thickeners produce 16-18% TS sludge. Thickened sludge is directed to one of three anaerobic digesters. Digester #2 was online today. Digester #1 was storing sludge but was not actively receiving sludge. Digester #3 was not in use. WWTP staff are attempting to address an issue with excess ammonia that could cause inhibition within the digestion process. Digested sludge is then stored in tank T21. Sludge from T21 is then dewatered with a centrifuge.

One of two centrifuges online and operational. The second centrifuge is disassembled and has been sent out for repair. Mr. Diaz expected the repair to be complete within the next 3-6 months. Due to staffing challenges and one of two centrifuges online, the WWTP has an excess of solids in the treatment plant. Mr. Diaz is working to get all equipment online and operational and to provide adequate staffing to get caught up on the solids processing & disposal. A bulking agent is added to ensure %TS solids requirements are met. Land application of sludge is completed by Synagro. The most recent sludge sampling for priority pollutants occurred on March 2, 2021.

The Ostera process has been abandoned and all contracts were allowed to expire. Without the Ostera process online, the WWTP has experienced an issue with excess phosphorous and ammonia in filtrate and centrate returns to the WWTP influent. These flows have been returned back to the plant for further treatment since September 2020.

WWTP staff discussed producing optimal digester gas to operate microturbine cogeneration. At this time, the WWTP runs the majority of the microturbines on natural gas (5 of 8) and the remaining run on "conditioned" digester gas.

A lab review was conducted with Erin Lightstreet (QA Officer). Calibration logs, chain-of-custody forms, and reagents, etc. were reviewed.

Due to the Department's COVID-19 protocols, limited time was allowed for the on-site portion of the inspection. Additional records were requested for review to complete the inspection. Due to significant staffing changes after the inspection, all records were not submitted for review. Mr. Diaz provided additional records. The Department would like to review the following records as part of this inspection:

- Bypass log for outfall 001 from 2018-present
- Sample of SOPs, as available, as discussed over the phone
- Sample of process control data used to make process changes such as 30-minute settleability, MLSS, SVI, F/M ratios etc. from the week of March 15, 2021.
- Annual Stormwater Inspection forms from 2019-present
- List of significant repairs/replacements made within the York City collection system to address I/I in 2019-present

Please provide records within 15 days of receipt of report.



SEWAGE COMPLIANCE INSPECTION REPORT

Recommendations:

- Address SCADA system concerns to resume plant operations to be more automated as well as to address issues with the alarm system.
- Repair out-of-service equipment as soon as possible.
- Address I/I identified that is tied to outfall 001.
- Maintain offline BNR tanks with mixed liquor removed to reduce septic conditions from developing and so tanks are ready to be put online when needed.
- Consider addition of chemical to supplement biological phosphorus removal to ensure total phosphorus compliance when biosolids dewatering process is online.
- Properly store or secure sodium hypochlorite for outfall 001 to reduce the risk of damage to the tank.
- Consider developing a check list/form for outfall 001 bypass activities so appropriate information is documented such as flow rates, times that disinfection was started, etc.
- Work with contributing municipalities to develop a plan to address I/I issues.
- Document slope for pH meter calibration.



SEWAGE COMPLIANCE INSPECTION REPORT

Monitoring, Reporting and Recordkeeping (NPDES Permit Part A / WQM Permit)

On-site laboratory: Registered Accredited Accreditation By Rule Not Registered/Accredited N/A

On-site analyses: pH DO TRC All NPDES parameters None
 Other(s):

DEP Lab Registration/Accreditation #: **67-00645**

Lab Supervisor: **Joe Cocino**

Lab Supervisor Client ID: **323815**

License Expiration Date:

Comments:

Contract Laboratory Name: **Penn State (Biosolids)**

DEP Lab Accreditation #:

Address & Phone:

Parameters Analyzed:

Comments: **WETT testing and biosolids priority pollutant testing is contracted out.**

Sample Collection: Influent sampling prior to any treatment: Yes No Location: **After grit removal**

Influent sampled prior to all process return piping: Yes No N/A

Influent sampled prior to flow from septage receiving station: Yes No N/A

Effluent sampling after all treatment: Yes No Location: **Effluent channel after UV**

Location(s) adequate for representative samples: Yes No N/O

Parameters analyzed, sample frequencies and sample types meet permit requirements: Yes No N/O

Samples properly preserved during collection, storage and shipping: Yes No N/O

Sampler or sample temperature is recorded using NIST traceable thermometer: Yes No N/O

Comments:

Influent Samples: Being collected: Yes No N/O Samples are: Grab 8-hour comp 24-hour comp Other

Samples are: Flow Proportional Time Proportional Not flow proportional N/A

Sampler controlled by: Flow meter Timed Collection N/A Other:

Minimum aliquot volume at least 100 ml: Yes No N/A Composite sampler temperature during inspection: **4.6C**

Comments:

Effluent Samples: Being collected: Yes No N/O Samples are: Grab 8-hour comp 24-hour comp Other

Samples are: Flow Proportional Time Proportional Not flow proportional N/A

Sampler controlled by: Flow meter Timed Collection N/A Other:

Minimum aliquot volume at least 100 ml: Yes No N/A Composite sampler temperature during inspection: **5.0C**

Comments:

Sample records: Available for inspection: Yes No Retained for at least three years: Yes No

Includes: Collector name: Yes No Collection date/time: Yes No Collection location: Yes No

Analyst name: Yes No Analysis date/time: Yes No Analysis Results: Yes No

Analytical methods & quantitation limits: Yes No Chain-of-Custody forms: Yes No

Comments:

Bench sheets: Data is consistent with data on the DMR: Yes No N/A Month(s)/year checked:

Comments: **Lab results for nutrient parameters were compared for March and September 2020 as part of the Chesapeake Bay audit. In addition, a review of DMRs will be conducted in the near future.**



SEWAGE COMPLIANCE INSPECTION REPORT

Monitoring, Reporting and Recordkeeping (NPDES Permit Part A / WQM Permit)

Field Testing: Completed within required hold time: Yes No N/O
Equipment is calibrated as required: pH: Yes No N/O DO: Yes No N/O N/A
pH Buffers current: Yes No TRC Meter checked against standards: Yes No N/O N/A
Calibration records maintained: Yes No N/O Calibration records up to date: Yes No N/O
Comments: **Document slope for pH calibration. TRC meter is only used for outfall 001 sampling.**

DMR Submittal: DMRs are submitted as required: Yes No N/O eDMR User: Yes No
All Supplemental Reports are submitted as required: Yes No N/O
DMRs include all sample results collected and analyzed using approved methods: Yes No N/O
Comments: **A supplemental form reflecting the required nutrient parameters for the Chesapeake Bay requirements is not included with monthly DMR submissions.**

Flow Measurement (NPDES Permit Part A / WQM Permit)

Primary flow meter and recorder: Operable: Yes No Properly maintained: Yes No
Measuring device type: Flume Weir Full Pipe Open Channel Other:
Meter type: Ultrasonic Magnetic Meter Bubbler Other:
Flow measurement location(s): Influent Effluent
Meter location: **Influent: after grit removal; Effluent: around UV**
Recorder type: Totalizer Daily Chart 7-Day Chart SCADA/Electronic Other:
Flow meter capable of recording hydraulic design capacity: Yes No Calibration Range: **Not available**
Inspection frequency: Daily Weekly Other:
Calibration frequency: **Quarterly** Date of last calibration: **12/1/2020**
Issues noted with measurement and/or recording of flow: Yes No N/A
Influent flow is measured before all return lines: Yes No Influent flow is measured after hauled-in wastes: Yes No
Effluent flow is measured after all withdraws: Yes No N/A
Comments: **Effluent flow appears to be reported on the DMRs**

Flumes: Flow is uniform across the channel: Yes No N/A Flume is free of debris and deposits: Yes No N/A
Maximum flow capable of measurement with flume: **N/A** MGD
Comments:

Weirs: Clean with a visible air space below the nappe: Yes No N/A
Maximum flow capable of measurement with weir: MGD
Comments:

Treatment Plant (NPDES Permit Part B / WQM Permit)

Treatment plant bypass: Since last inspection: Yes No N/O Reported to DEP: Yes No
Location/cause: **August 7, 2020-wet weather discharge via outfall 001**

Major equipment repair/replacement: Since last inspection: Yes No N/O
Repair List: **See Comments**

Stand-by power: Emergency generator Dual power feed None Other:
System operable: Yes No Exercise frequency: Maintenance frequency:
Unit exercised under load: Yes No N/A
Comments:

SEWAGE COMPLIANCE INSPECTION REPORT

Treatment Plant (NPDES Permit Part B / WQM Permit)		
<p>Alarms: Type: <input type="checkbox"/> None <input checked="" type="checkbox"/> SCADA <input type="checkbox"/> Auto Dialer <input type="checkbox"/> PLC <input type="checkbox"/> Other: System operable: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/O Test frequency: Alarm triggers: Alarm portion of SCADA system is not properly working</p>		
<p>Staffing schedule: <input checked="" type="checkbox"/> 24/7 Weekday hours: to Weekend/Holiday hours: to Comments: Two 12-hour shifts</p>		
<p>On site Logs: Facility maintains a daily operations log: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Daily log up-to-date: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Daily Log contains: <input type="checkbox"/> Visual observations <input checked="" type="checkbox"/> Process adjustments <input type="checkbox"/> Problems and concerns Repair log maintained: <input type="checkbox"/> Yes <input type="checkbox"/> No Routine maintenance log maintained: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Comments: Maintenance logs were not available at the time of the inspection. A work order system is in place. A sample work order was reviewed.</p>		
<p>Spare parts inventory maintained: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Standby units available: <input type="checkbox"/> Yes <input type="checkbox"/> No Comments:</p>		
<p>Facility Process Control Plan required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/O Is the plan implemented: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> N/O System specific management plan available: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> N/O Comments:</p>		
Process Control (NPDES Permit Part B / WQM Permit)		
Parameter	Frequency of Testing	Current Testing Results
<input checked="" type="checkbox"/> Settleability	Daily	Not available
<input checked="" type="checkbox"/> Dissolved Oxygen	Continuously monitoring	DOs were highest in the influent zones of the BNR tanks
<input checked="" type="checkbox"/> Alkalinity	2/week	
<input checked="" type="checkbox"/> Sludge Blanket	Daily	Records were reviewed from 3/2021 Primary clarifiers-6/day; Trains #2 and #3: 3/day
<input checked="" type="checkbox"/> Mixed Liquor Suspended Solids (MLSS)	Daily	
<input checked="" type="checkbox"/> Mixed Liquor Volatile Suspended Solids (MLVSS)	3/week	
<input type="checkbox"/> Microscopic exam of mixed liquor		
<input checked="" type="checkbox"/> Color <input type="checkbox"/> Odor		Mixed liquor in the BNR tanks had a chocolate brown color
<input type="checkbox"/> Other:		
Operators		
<p>Total Number of Available Operators at this facility: 3</p> <p>Does a non-certified operator make process control decisions at this facility: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/O Does facility have a written SOP to direct non-certified operator activities: <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/O Available Operator interviewed has reviewed a copy of facility NPDES permit: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Comments: Several management staff are also certified. Mr. Diaz said most process control decisions are made under the direction of Mr. Campagne or himself.</p>		

SEWAGE COMPLIANCE INSPECTION REPORT

Treatment Process Units (NPDES Permit Part B / WQM Permit)				
Treatment Units	Total	On-Line	Inoperable	Date Inoperable / Expected Date Return to Service / Comments
Bar screen	2	1	1	
Grit removal system	2	1		Both were in-use but pump for # was inoperable
Raw pump station	1	1		
Primary clarifiers	5	3	0	
T2: Anaerobic tanks	2	1	0	
T2: Aeration tanks	6	3	0	
T2: Anoxic	2	1	0	
T2: Reaeration zone	2	1	0	
T2: Final clarifiers	3	3		
T3: Anaerobic tanks	3	2	0	
T3: Aeration tanks	9	6		
T3: Anoxic tanks	3	2		
T3: Reaeration zone	3	2		
T3: Final clarifiers	3	3		
Cloth filters	4	2	0	
UV	3	2	0	Unit #3 was being cleaned during the inspection
Anaerobic digesters	3	1		
Gravity belt thickener	2	1		
Centrifuge	2	1	1	One centrifuge was sent out for repair
O&M Manuals available for major pieces of equipment: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O				
Comments:				
<u>Chemical Additions:</u> Grease product is added for grease control. Defoamer is added after UV disinfection. Sodium hypochlorite is used for disinfection at outfall 001 only. Polymer is added for sludge handling.				



SEWAGE COMPLIANCE INSPECTION REPORT

Other Requirements (NPDES Permit Part C / WQM Permit)

Special Conditions: Next submission/action:

Due Date:

- None
 WETT:
 TRE/TIE:
 EPA Pretreatment Program **Completion of Annual Stormwater Inspection form**
 Stormwater requirements:
 Permit Schedule:
 TMDL **Chesapeake Bay capload: total nitrogen: 474,880 lbs., total phosphorus: 63,317 lbs.**
 Other:
 Comments:

PPC Plan: Available on-site: Yes No N/A N/O

Last updated:

Comments:

Compliance History

Effluent Violation in the last 12 months: Yes No N/ORecent Compliance Actions: Yes NoComments: **Notice of Violation will be issued to address effluent violations in 2020-present**Legal Agreement: Consent Order and Agreement, Consent Decree or Order: Yes No N/O Date executed:In compliance with legal agreement: Yes No Could not confirm during field inspection

Obligations due next:

Comments:

Sewage Treatment Plant

Treatment Plant Design Capacity: Hydraulic (MGD): **26 MGD** Organic (PPD): **62,884 lbs. BOD**High Flow Management / Maintenance Plan Available: Yes No N/A Plan implemented at: **26 MGD**Hauled in wastes: Facility accepts hauled in wastes: Yes No Reported to DEP on proper forms: Yes No N/A N/OFlow at which facility stops accepting hauled in waste (MGD): N/A N/O

Comments:

Solids Management: Disposal records available: Yes No N/O Retained for at least five years: Yes No

Production for calendar year:

Production estimated using EPA Composite Correction Approach: Yes No Disposal within 15% of estimate: Yes NoHauler: **Synagro**Disposal location: **Biosolids are land applied**Comments: **Total produced not available at time of inspection.**

SEWAGE COMPLIANCE INSPECTION REPORT

Collection System

Chapter 94 Report: Submitted: Yes No N/A N/O Hydraulic or Organic Overload: Yes No N/A N/O

Comments:

Permitted facility receives flow from contributing collection systems owned/maintained by others: Yes No N/O

Comments: **Manchester Township, North York Borough, Spring Garden Township, West Manchester Township, West York Borough, York Township. Springettsbury Township has a wet weather connection.**

Sanitary Sewer Overflows: Since last inspection: Yes No Reported to DEP: Yes No

Location/cause: **SSO typically caused by blockages**

Collection system: Owned by: Permittee Other: **Contributing municipalities**

Maintained by: Permittee Other: **Contributing municipalities**

Maintenance performed: Regularly scheduled As problems occur None N/A

Type of maintenance: Televised:

Jetted/Root Cutting:

Smoke Testing:

Other:

Sewer Shed metering:

Sewers repaired/replaced:

Inflow and Infiltration: Facility reports influences of: Inflow Infiltration

Detail I&I Detection work performed since last inspection: **Not available at time of inspection**

Detail I&I Removal work performed since last inspection: **Not available at time of inspection**

Comments:

Pump Stations: Total number: **1** Inspection frequency: **Weekly**

Operator Name: **Frankie Campagne** Client ID: **336338** Class-Subclasses: **A,E-1,2,3,4** License Exp. Date: **6/30/2021**

Flow measurement: Metered Estimated Other:

Pump stations monitored with alarm systems: Yes No N/A N/O

Pump stations capable of operation with backup auxiliary power: Yes No N/A N/O

Comments:



SEWAGE COMPLIANCE INSPECTION REPORT

Effluent / Receiving Water Evaluation					
Outfall Number(s): 001		Stream Name: Codorus Creek			
DEP Collector #:	Field Measurements:	Upstream	Outfall	Downstream	Units
Sample Date/Time:	Flow				MGD
Sample Location:	pH				S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen				mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature				° C
Upstream Observations: <input type="checkbox"/> Not Observed					
Outfall Observations: <input checked="" type="checkbox"/> Not Observed					
Downstream Observations: <input type="checkbox"/> Not Observed					
Outfall Number(s): 002		Stream Name: Codorous Creek			
DEP Collector #: 0463 746	Field Measurements:	Upstream	Outfall	Downstream	Units
Sample Date/Time: 03/18/2021; 13:45	Flow				MGD
Sample Location: Effluent cascade; Clear effluent	pH		7.46		S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen		10.22		mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature		13.2		° C
Upstream Observations: Okay <input type="checkbox"/> Not Observed					
Outfall Observations: Clear with some foam <input type="checkbox"/> Not Observed					
Downstream Observations: Okay <input type="checkbox"/> Not Observed					
Outfall Number(s):		Stream Name:			
DEP Collector #:	Field Measurements:	Upstream	Outfall	Downstream	Units
Sample Date/Time:	Flow				MGD
Sample Location:	pH				S.U.
	Conductivity				µmhos/cm
	Dissolved Oxygen				mg/L
	Total/Free Chlorine Residual				mg/L
	Temperature				°
Upstream Observations: <input type="checkbox"/> Not Observed					
Outfall Observations: <input type="checkbox"/> Not Observed					
Downstream Observations: <input type="checkbox"/> Not Observed					



SEWAGE COMPLIANCE INSPECTION REPORT

Photographs

A large, empty rectangular box with a black border, intended for the insertion of photographs. The box is divided into three horizontal sections by thin white lines, but it is currently blank.



Date of Issue: 04/08/2021 04:03:47

DEP Bureau of Laboratories - Harrisburg
P.O. Box 1467
2575 Interstate Drive
Harrisburg, PA 17105-1467

Contact Phone Number: (717) 346-7200

NELAP - accredited by

NJ DEP - Laboratory Number: PA059
PA DEP LAP - DEP Lab ID: 22-00223

Analytical Report For
Water Quality Protection

Sample ID: 0463 746

Date Collected: 03/18/2021 01:45:00 PM

Lab Sample ID: B2021000660

Status: Completed

Name of Sample Collector: Heather Dock

Date Received: 03/19/2021

County: York

State:

Municipality: York

YORK CITY STP

1701 BLACK BRIDGE RD

YORK PA. 174021911

Facility/Permit ID: PA0026263

FIX ID: 480734

Facility: YORK CITY STP

Sub-Facility: 002

FIX ID: 349264

Name: OUTFALL 002 - CODORUS CR

Sample Medium: Effluent

Sample Medium Type: Effluent And Influent

Location: Effluent cascade

Reason: Routine Sampling

Project: NOT INDICATED

Standard Anlysis: B002

Matrix: Water

Stream Condition:

Analytical Report For
Water Quality Protection

Sample ID: 0463 746

Date Collected: 03/18/2021 01:45:00 PM

Lab Sample ID: B2021000660

Appendix A-20-f
Status: Completed

Sample Standard Comment: Holding time exceeded

Appearance: Clear

Test Codes / CAS # - Description	Reported Results	Date And Time Analyzed	Approved by	Test Method
31616 Fecal Coliform	14 /100mL	03/19/2021 08:54 AM	HEBLOSS	SM 9222D

The results of the analyses provided in this laboratory report relate only to the sample(s) identified therein. Unless otherwise noted, the results presented on this laboratory report meet all requirements of the 2016 TNI standard. Sample was in acceptable condition when received by the Laboratory. Any exceptions are noted in the report.

* denotes tests that the laboratory is not accredited for

U - Indicates analysis was performed for the test but it was not detected. The sample quantitation limit is reported.

J - Indicates an estimated value, reported between Reporting Limit (RL) and Minimum Detection Limit (MDL).

Jennifer Fesler, Technical Director, Bureau of Laboratories



Date of Issue: 04/07/2021 04:06:37

DEP Bureau of Laboratories - Harrisburg
P.O. Box 1467
2575 Interstate Drive
Harrisburg, PA 17105-1467

Contact Phone Number: (717) 346-7200

NELAP - accredited by

NJ DEP - Laboratory Number: PA059
PA DEP LAP - DEP Lab ID: 22-00223

Analytical Report For
Water Quality Protection

Sample ID: 0463 746

Date Collected: 03/18/2021 01:45:00 PM

Lab Sample ID: I2021004786

Status: Completed

Name of Sample Collector: Heather Dock

Date Received: 03/19/2021

County: York

State:

Municipality: York

YORK CITY STP
1701 BLACK BRIDGE RD
YORK PA. 174021911

Facility/Permit ID: PA0026263

FIX ID: 480734

Facility: YORK CITY STP

Sub-Facility: 002

FIX ID: 349264

Name: OUTFALL 002 - CODORUS CR

Sample Medium: Effluent

Sample Medium Type: Effluent And Influent

Location: Effluent cascade

Reason: Routine Sampling

Project: NOT INDICATED

Standard Anlysis: 077

Matrix: Water

Stream Condition:

Analytical Report For
Water Quality Protection

Sample ID: 0463 746

Date Collected: 03/18/2021 01:45:00 PM

Lab Sample ID: I2021004786

Appendix A-20-f
Status: Completed

Appearance: Clear

Test Codes / CAS # - Description	Reported Results	Date And Time Analyzed	Approved by	Test Method
00410 ALKALINITY AS CaCO3 @ pH 4.5	159.0 mg/L	03/23/2021 01:28 PM	JAHOUE	SM 2320B
ANSWER RECHECKED BY ANALYST Alkalinity Standard failed low				
00610A AMMONIA TOTAL AS NITROGEN	0.48 mg/L	03/23/2021 10:12 PM	MTUZINSKI	EPA 350.1
00314 CARBONACEOUS BIOCHEMICAL OXYGEN DEMAND 5 DAY	2.30 mg/L	03/19/2021 02:20 PM	JRONEMUS	SM 5210B
00625A Total Kjeldahl Nitrogen	1.56 mg/L	03/31/2021 11:53 AM	MBOTTS	EPA 351.2
00620A Total Nitrate Nitrogen-Colorimetric	1.53 mg/L	03/19/2021 10:01 AM	TBEAR	EPA 353.2
00615A Total Nitrite Nitrogen-Colorimetric	0.24 mg/L	03/19/2021 10:01 AM	TBEAR	EPA 353.2
00665A Total Phosphorus as P	0.290 mg/L	03/23/2021 10:04 PM	LBENT	EPA 365.1
00530V TOTAL SUSPENDED SOLIDS	<5 mg/L (U)	03/19/2021 08:42 AM	MARMANIOUS	USGS I-3765

The results of the analyses provided in this laboratory report relate only to the sample(s) identified therein. Unless otherwise noted, the results presented on this laboratory report meet all requirements of the 2016 TNI standard. Sample was in acceptable condition when received by the Laboratory. Any exceptions are noted in the report.
* denotes tests that the laboratory is not accredited for

U - Indicates analysis was performed for the test but it was not detected. The sample quantitation limit is reported.

J - Indicates an estimated value, reported between Reporting Limit (RL) and Minimum Detection Limit (MDL).

Jennifer Fesler, Technical Director, Bureau of Laboratories



April 13, 2021

NOTICE OF VIOLATION

Via Electronic Mail

York City Sewer Authority
c/o Ms. Stacey R. MacNeal Esq.
Katherman, Heim & Perry
345 East Market Street
York, PA 17403
stacey@khlaw.us

Re: Sewage 3-B
York City WWTP
NPDES Permit No. PA0026263
Manchester Township, York County

Dear Ms. MacNeal:

As a follow-up to our March 29, 2021 field investigation of a discharge sewage sludge from the York City WWTP to the facility stormwater collection and conveyance system and to Lightner Creek, waters of the Commonwealth, I am requesting that you submit a full report of your own independent investigation to include the circumstances leading to the incident, the details of the incident itself, and the measures taken to alleviate the problem, with associated dates and times.

We ask that you submit this report within twenty-one (21) calendar days of the date of this letter.

The above-referenced discharge to waters of the Commonwealth constitutes a violation of Sections 201 and 202 of The Clean Streams Law, 35 P.S. Section 691.1 *et seq.* Immediate notification to this office, in conjunction with containment and cleanup, is required by the Department's regulations in the event of an incident that causes or has the potential to cause such a discharge.

A copy of the Department's March 29, 2021 incident response report is attached for your records.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its

Ms. Stacey R. MacNeal Esq.

April 13, 2021

statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.705.4775 or eammon@pa.gov.

Sincerely,


Erick M. Ammon
Environmental Protection Compliance Specialist
Clean Water Program

Enclosure: 03/29/2021 Incident Response Report

Electronic cc:

Mr. Frankie Campagne, York City WWTP General Manager (fcampagne@yorkcity.org)

SEWAGE INSPECTION REPORT

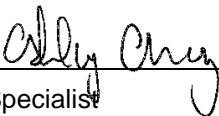
Permit Number	Inspection Date	Entry Time	Exit Time	Inspection Type	Inspection ID
PA0026263	03/29/2021	10:24	10:40	INCDT	3168047
Municipality	York		County	York	
Facility Name	YORK CITY STP		Permittee Name	YORK CITY YORK CNTY	
24-Hour Emergency Contact Person/Phone	/		Email	----	
Physical Location Address	1701 BLACK BRIDGE RD, YORK, PA, 17402-1911				
Permit Expiration Date	08/31/2022	Next Submittal ---- Due Date	----		
Violations*	Violation(s) Noted				
	<p>1. P.L. 1987, No. 394, Sec 201: CSL - Unauthorized, unpermitted discharge of sewage to waters of the Commonwealth Discharge of sewage treatment sludge from York City WWTP solids management process to the surface of the ground and to Lightner Creek (UNT to the Codorus Creek), waters of the Commonwealth, is a violation of Sections 201 & 202 of the PA Clean Streams Law.</p>				
Recommendations					
Please cleanup and remove accumulated sewage sludge and sewage solids from the surface of the ground, from the WWTP stormwater collection and conveyance system, and Lightner Creek (UNT to Codorus Creek) within fifteen (15) calendar days.					
Please submit and incident summary report within five (5) calendar days.					
A Notice Of Violation will follow for a formal response to include a cleanup/remediation summary, incident cause analysis, and plans for repair/replacement of WWTP equipment.					
Person Interviewed	Frankie Campagne	Date	03/29/2021	Inspector	ERICK M AMMON
Signature		Phone Number	(717) 845-2794	Signature	
phone call				Phone Number	(717) 705-4775
Title	WWTP Superintendent		Title	ENVTL PRO CMLPLNC SPCST	
Email	fcampagne@yorkcity.org		Email	eammon@pa.gov	
<p>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/or review of Department records.</p>					

SEWAGE INSPECTION REPORT

Facility Details Section			
Responsible Official	JAMES E GROSS	Title	VICE-CHMN
Business Phone	(717) 845-9496	Email	----
Permittee Address	100 E MARKET ST, YORK, PA, 17401-1219		
Certified Operator	CAMPAGNE FRANKIE A	Client ID	336338
Certificates	A,E-1,4	Certification Status	Active
		Expiration Date	06/30/2023
Is a Copy of the permit(s) on-site?		----	
Has the interviewed operator/person reviewed the facility's permit(s)?		----	
Comments			
<p>Phone call at 10:24 today (Mon. 3/29) with Frankie Campagne, Superintendent at York City Sewer Authority WWTP, to discuss sludge discharge incident reported to PADEP SCRO 24-hour ER phone line at 09:52 on Saturday, March 27, 2021. At approximately 0530 on Saturday, March 27, 2021, YCSA WWTP staff discovered a spill of digester sludge at the YCSA WWTP solids treatment building. The digester sludge flowed to a stormwater drain adjacent to the old centrate tanks and most likely discharged to an Unnamed Tributary to the Codorus Creek (Lightner Cr.?) that runs between the main WWTP and WWTP Train #3 (upgrade/expansion) to the north. WWTP staff were able to stop the leak by 0800. WWTP staff worked with Kline's, a hauling/cleanup contractor, to contain the spilled sludge, apply sand and lime to the affected areas, and remove safely accessible sludge accumulations by 17:30 on Saturday evening. The ornamental brick wall around parts of Digester #2 collapsed so WWTP staff will not remove accumulated sludge from that area due to safety concerns. At this time it appears that sludge was discharged to the surface of the ground from the rain downspouts around Digester #1 and from the area where the wall collapsed on Digester #2. During the initial response, WWTP determined that sludge levels in Digesters #1 & #2 were above normal safe operating levels (28 feet), with Digester #1 @ 29.71'. WWTP staff contracted with Keystone Pipe and Pump to work to transfer sludge from Digesters #1 & #2 to Digester #3, which was mostly empty after a recent cleaning/rehab project. WWTP staff plan to empty Digester #1 for cleaning and maintenance/repair/replacement project. Digester levels at time of call: #1: ~19', #2: 19', #3: 12.5'. Primary sludge and secondary clarifier WAS is currently discharging to Digester #3. I did not discuss the status or levels of the two additional sludge holding tanks (sludge dosing for BFP & Centrifuge) within the sludge treatment system during the call. WWTP staff currently estimate that ~3,000 gallons of sludge discharged from the digesters. At this time, WWTP operators and engineers from Buchart Horn are working to locate the exact source of the leak(s). There have been no additional sludge discharges from the digester area after the initial incident on Saturday, March 27th. PADEP SCRO Clean Water Program field staff plan to respond to the WWTP this afternoon for an incident investigation sometime this afternoon (3/29).</p>			
Participants:			



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

NPDES Permit No. <div style="border: 1px solid black; padding: 2px; text-align: center;">PA0026263</div>	Mo/Day/Yr <div style="border: 1px solid black; padding: 2px; text-align: center;">03/29/2021</div>	Entry Time <div style="border: 1px solid black; padding: 2px; text-align: center;">1155</div>	Exit Time <div style="border: 1px solid black; padding: 2px; text-align: center;">1345</div>	Inspection Type <div style="border: 1px solid black; padding: 2px; text-align: center;">INCDT</div>	eFACTS Inspection ID <div style="border: 1px solid black; padding: 2px; text-align: center;">3175810</div>
Facility Name York City STP			Permittee Name York City Sewer Authority		
Physical Location 1701 Black Bridge Road, York, PA 17402				Permit Expiration Date 09/23/2021	
Municipality York City		County York		Permit Renewal Application Due	
Facility Type <input checked="" type="checkbox"/> Sewage <input type="checkbox"/> Industrial Waste <input type="checkbox"/> Industrial Stormwater <input type="checkbox"/> Other: <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor					
Responsible Person James Gross			Certified Operator Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Title Vice Chairman			Certified Operator in Responsible Charge: Mr. Frankie Campagne		
Permittee Address 100 East Market Street York, PA 17401			Client ID 336338 Class-Subclass(es): A,E -1,4 Circuit Rider: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Business Phone 717.845.9496 Fax Email			Business Phone 717-845-2794 Cell 717-324-6572 Email fcampagne@yorkcity.org		
24-Hour Emergency Contact Person / Phone					
VIOLATIONS: (list below) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Pending Sample Results					
The discharge of sewage sludge from the YCSA WWTP to the WWTP storm sewer collection and conveyance system and into Lightner Creek, waters of the Commonwealth, was not authorized by permit or regulations and thereby constitutes violations of NPDES Permit No. PA0026263 and Sections 201 and 202 of The Clean Streams Law, 35 P.S. §§ 691.201 and 691.202.					
A Notice of Violation will follow for a formal response.					
Person Interviewed Frankie Campagne		Date 03/29/2021	Inspector Ashley Chong		Date 03/29/2021
Signature Report sent electronically DATE		Phone No.	Inspector Signature 		Phone No. 717.705.4870
Title WWTP General Manager			Title Water Quality Specialist		
Email			Email achong@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.					



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

Comments

An inspection was conducted by A. Chong (Water Quality Specialist) with Frankie Campagne (General Manager) following a report of a sewage discharge on March 27, 2021.

Mr. Campagne believes that Digester #2 was overfilled, causing wastewater to fill the space between the concrete wall of the digester and brick wall surrounding the digester. The buildup of and pressure from the wastewater would have caused the brick wall to collapse (Photo 1). He is not sure what caused the overfilling, whether it be operator error or an error with the probe and machines.

About 3,000 gallons of wastewater entered a stormwater catch basin (Photo 2). The wastewater discharged to the UNT at Outfall 006 (Photo 3). There was a sewage odor at the outfall. I observed live fish downstream around Outfall 007. Some wastewater traveled across the paved lot and pooled next to a grassy area (Photos 4 and 5). Mr. Campagne stated that the sewage was so thick it did not flow over the grass. No odor was present in this area.

Some wastewater had discharged from Digester #1 (Photos 6 and 7). Wastewater discharged to a nearby catch basin (Photo 8). Lime was applied and socks were placed.

At the time of the inspection, Digester #1 was filled to about 29' in height. Mr. Campagne stated that he would like to see if the sludge in Digester 1 can settle so that the water can be decanted. If it cannot settle, York City will have Kline's pump out all 1.4 million gallons. Kline's collected a sample when I was onsite.

Wastewater in Digester #2 was down to 18'. Sludge in Digester #2 was being dewatered using their centrifuge.

Digester 3 was filled about 10-12'. Mr. Campagne stated that the contents in Digester #3 could potentially be used as return sludge.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

Photos



Photo 1. Collapsed brick wall of Digester 2. Photo taken by Ashley Chong.



Photo 2. Stormwater catch basin which wastewater had entered; hay bales placed on top.
Photo taken by Ashley Chong.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

Photos



Photo 3. Outfall 006 where discharge of wastewater occurred. Sewage odor present.
Photo taken by Ashley Chong.



Photo 4. Lime applied to paved lot where wastewater had discharged to.
Photo taken by Ashley Chong.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

Photos



Photo 5. Low area where wastewater had pooled. Photo taken by Ashley Chong.



Photo 6. Stormwater drain for Digester #1 which wastewater had entered and discharged from.
Photo taken by Ashley Chong.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
NPDES COMPLIANCE INSPECTION REPORT

Photos



Photo 7. Closeup of where wastewater had discharged at Digester #1. Photo taken by Ashley Chong.



Photo 8. Catch basin which wastewater had entered next to Digester #1. Photo taken by Ashley Chong.



UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Michael R. Helfrich, Mayor
Mayor's Office
101 South George Street
York, PA 17401

Henry H. Nixon, President
York City Council
101 South George St.
York, PA 17401

H. Michael Buckingham
York City Council
York City Sewer Authority
101 South George St.
York, PA 17401

**Re: Notice of Potential Violations and Opportunity to Confer
NPDES Permit #PA0026263**

Dear Sirs:

This letter is in reference to an ongoing investigation the United States Environmental Protection Agency, Region III, (EPA or Agency) is conducting with regard to compliance with Pennsylvania (PA) National Pollutant Discharge Elimination System (PA NPDES) Permit No. PA0026263 (the Permit). The Permit regulates discharges from the City of York Wastewater Treatment Plant (the WWTP or the Facility), located in Manchester Township, PA. It is EPA's understanding that the York WWTP is owned by the City of York Sewer Authority (the Authority) and operated by the City of York (the City) and the Permit is issued to the Authority. On May 29, 2019, EPA conducted an inspection (the Inspection) of the York WWTP. The general purpose of the Inspection was to determine the Permittee's compliance with the requirements of the Permit, which, as a general matter, regulates operation of the WWTP related to discharges from the WWTP to Codorus Creek.

Following the Inspection, by letter dated July 17, 2019, EPA provided a copy of the report documenting the EPA Inspection (the Inspection Report) to the WWTP. By letter dated July 29, 2019, the Authority provided a response to the Inspection Report. By letter dated April 2, 2020, EPA requested information relating to compliance with the Permit (EPA Request for Information). On May 22, 2020, EPA received a response to the EPA Request for Information.

The information currently available to EPA suggests that the Permittee may be in violation of the requirement of the Clean Water Act and its regulations. By this letter, EPA is extending the Authority

Re: *Notice of Potential Violations and Opportunity to Confer*
NPDES Permit #PA0026263

and the City an opportunity to advise the Agency, via telephone or other virtual telecommunications, or in writing, of any further information the EPA should consider with respect to the potential violations.

Potential CWA Violations Identified by EPA

Section 301 of the Clean Water Act (CWA), 33 U.S.C. § 1311, prohibits the discharge of any pollutant from a point source to a water of the United States, except in compliance with, among other things, a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. Pursuant to Section 402(b) of the Act, 33 U.S.C. § 1342(b), during 1978, EPA first authorized the Commonwealth of Pennsylvania to issue NPDES permits and such authority was re-authorized during 1991. In accordance with Section 402 of the CWA, 33 U.S.C. § 1342, Pennsylvania issued the Permit.

The information currently available to EPA suggests that the Permittee may have potentially violated the Permit. The enclosed proposed Administrative Order on Consent (Proposed AOC) identifies certain potential violations of the Permit. These potential violations include:

- Part A.I.A. of the Permit defines effluent limitations, monitoring, recordkeeping, and reporting requirements for Outfall 001 discharges. During January 1, 2017 through July 31, 2020, the Facility experienced 42 effluent limit exceedances from Outfall 001 (i.e. during bypass events). A summary of the forty-two (42) Outfall 001 exceedances at issue is included in Table 1 of the Inspection Report and in the enclosed Proposed AOC. Therefore, during January 1, 2017 through July 31, 2020, the Permittee may have violated the requirements set forth at Part A.I.A. of the Permit.
- Part A.I.B. of the Permit defines effluent limitations, monitoring, recordkeeping, and reporting requirements for Outfall 002 discharges. During January 1, 2017 and July 31, 2020, the Facility experienced fifteen (15) effluent limit exceedances from Outfall 002. A summary of the fifteen (15) Outfall 002 exceedances at issue is included in the enclosed Proposed AOC. Therefore, during January 1, 2017 through July 31, 2020, the Permittee may have violated the requirements set forth at Part A.I.B. of the Permit.
- Permit Part B.I.E.2. states: “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms of and conditions of this permit.” As the Inspection Report and the enclosed AOC describe in detail, during the Inspection, EPA inspectors observed:
 - several pieces of equipment that contribute to the full treatment capacity of the Plant were either out of service or partially functioning. As described in detail in the Inspection Report and enclosed Proposed AOC, the equipment that was either out of service or partially functioning included: i) an influent channel, ii) Primary Clarifiers No. 1, 3 and 5, iii) one of three screw pumps that convey wastewater from the Train #2 secondary clarifiers to the sand filters, iv) the sand filters, v) the automatic chlorine injection system and vi) the Facility supervisory control and data acquisition (SCADA) system.

Re: *Notice of Potential Violations and Opportunity to Confer*
NPDES Permit #PA0026263

- malfunctioning secondary treatment units based upon: a) scum and floatable solids accumulated in the secondary clarifiers of Train #2, b) foam in the anoxic basins at the effluent of the BNR systems for Trains #2 and #3 and c) algae and vegetation on and around the step aerator at Outfall 002.
- deficiencies relating to tracking of maintenance activities at the Facility, including failure to complete work orders generated during the past year and limited functionality of the Facility's computerized maintenance management system.

Therefore, at the time of the Inspection, the Permittee may have violated the requirements set forth at Part B.I.E.2. of the Permit.

- Part C.V.E. of the Permit states, "At an influent flow rate of 53 MGD or higher, the Train #2 Secondary Clarifier effluent, bypassing existing sand filters and UV disinfection system, may be discharged to Codorus Creek via Outfall 001, contingent upon compliance with effluent limitations and monitoring requirements identified in Part A of this permit. Except for the Train #2 Secondary Clarifier effluent and stormwater, discharge of other wastewaters via Outfall 001 is prohibited." As the Inspection Report and the enclosed AOC describe in detail, during the Inspection, EPA inspectors were informed that to protect the biology in the biological nutrient removal systems, these systems are typically taken offline (i.e. no treatment, just flow through) during wet weather events as influent flows approach 25 to 26 MGD. During July 2018 through May 2019, this practice resulted in at least five bypass events whereby a mixture of stormwater, groundwater and partially treated wastewater was discharged from Outfall 001 to Codorus Creek. Therefore, during July 2018 through May 2019, the Permittee may have violated the requirements set forth at Part C.V.E. of the Permit.

Opportunity to Confer

Based upon the currently available information, EPA is considering the appropriate enforcement response to the above described potential violations of the Permit. Pursuant to the CWA, the United States can seek compliance with the Permit and penalties for noncompliance with the Permit by initiating either: a) a civil action in federal district court or b) an administrative action, either of which may include a complaint, demand for civil penalties or an order for compliance.

Although such enforcement authorities are available to EPA, prior to determining whether to take enforcement action, by this letter, EPA is providing Permittee an opportunity to meet and/or confer with EPA representatives, via telephone or other virtual telecommunication, to demonstrate to EPA, through the submission of additional information, that the Permittee was in compliance with the Permit at the time of the Inspection. This meeting is referred to by EPA as an Opportunity to Confer Meeting.

To take advantage of this opportunity and schedule an Opportunity to Confer Meeting, the Permittee must contact Ms. Kaitlin McLaughlin by telephone at 215-814-2393 within twenty-one (21) calendar days of receipt of this letter. During that call, EPA and the Permittee will schedule an Opportunity to Confer Meeting to take place via telephone or another virtual telecommunication and discuss how Permittee may submit additional information.

Re: *Notice of Potential Violations and Opportunity to Confer*
NPDES Permit #PA0026263

The enclosed Proposed AOC is provided to the Permittee as an example of administrative order that could address the potential violations, and it is attached for purposes of settlement negotiations only. Therefore, the enclosed Proposed AOC is confidential and is not a final enforceable order mandating any action. The proposed measures in the Proposed AOC are EPA's current proposed settlement terms, based on the evidence of potential violations currently available to EPA, as described in the Proposed AOC. Thus, the Permittee is not currently required to take any actions described in the Proposed AOC.

In the event that the Permittee chooses to decline EPA's invitation to: a) arrange and attend an Opportunity to Confer Meeting and b) provide EPA with additional information that the Permittee believes demonstrates that the allegations of noncompliance, as set forth in the enclosed Proposed AOC, are factually or legally inaccurate or incorrect, EPA reserves the right to pursue an enforcement action to address the violations described in the enclosed Proposed AOC at any time subsequent to **twenty-one (21) calendar days** of receipt of this letter.

Please note that to the extent there is ongoing noncompliance with any Permit issued to the Permittee, such noncompliance should be corrected immediately. EPA specifically reserves the right to use any and all enforcement tools at its disposal to address violations at the Facility regardless of any future discussions in response to this letter.

If, in the course of discussing this matter with the Agency, the Permittee intends to submit documents or information to EPA, please be advised that you are entitled to assert a claim of business confidentiality (CBI claim) covering any part or all of the information you submit to EPA, however, any assertion of a CBI claim must be made in the manner described in 40 C.F.R. § 2.203(b). Information subject to a CBI claim will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a CBI claim is asserted at the time the information is submitted to EPA, EPA may make this information available to the public without further notice to Permittee.

Any submission of information or documentation to EPA relating to this matter must include the following certification signed by the Permittee or legal counsel representing Permittee:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to the Request to Show Cause and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fine and/or imprisonment.

Signature: _____

Printed Name: _____

This letter is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

As EPA understands that the Permittee is represented by legal counsel, EPA requests that such legal counsel please direct his/her written response, as well as all questions and communications with respect to any matters addressed in this letter, to Kathleen Root, Esq., Senior Assistant Regional Counsel, EPA, Region III, by phone at (215) 814-2684 or by email at root.kathleen@epa.gov.

Re: *Notice of Potential Violations and Opportunity to Confer*
NPDES Permit #PA0026263

Please carefully consider the settlement negotiation opportunities being made available through this letter.

Sincerely,

KAREN
MELVIN

Digitally signed by
KAREN MELVIN
Date: 2020.12.10
13:06:17 -05'00'

Karen Melvin, Director
Environmental & Compliance Assurance Division

Enclosure

cc: Kathleen Root, Esq., EPA (Root.Kathleen@epa.gov)
Kaitlin McLaughlin, EPA (McLaughlin.Kaitlin@epa.gov)
Victor H. Landis, Environmental Group Manager, PADEP (Vlandis@pa.gov)
David Garrison, Esq., Garrison Environmental Law (dag@garrisonenvironmental.com)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

In the Matter of:)	
)	ADMINISTRATIVE ORDER FOR
City of York Sewer Authority)	COMPLIANCE ON CONSENT
345 East Market Street)	PURSUANT TO 33 U.S.C. § 1319(a)
York, PA 17403)	
)	
And)	Docket No. CWA CWA-03-2021-0044DN
)	
City of York)	
Mayor’s Office)	
101 South George Street)	
York, PA 17401)	
)	
Respondents)	
<hr style="width: 35%; margin-left: 0;"/>)	

I. STATUTORY AUTHORITY AND JURISDICTION

1. This Administrative Order for Compliance on Consent (AOCC or Order) is issued to the City of York Sewer Authority (the Sewer Authority) and the City of York (the City) (Respondents), under the authority vested in the United States Environmental Protection Agency (EPA) by Section 309(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1319(a). The Administrator has delegated this authority to the Regional Administrator of EPA Region III, who in turn has delegated it to the Director of the Enforcement & Compliance Assurance Division.
2. Section 309(a) of the Act provides, *inter alia*, that: “Whenever, on the basis of information available to [EPA], [EPA] finds that any person is in violation of any condition or limitation [implementing section 1311, 1312, 1316, 1317, 1318, 1328, or 1345 of this title] in a permit issued under section 1342 ... of this title, ... [EPA] shall issue an order requiring such person to comply with such condition or limitation ...” See 33 U.S.C. § 1319(a)(3).
3. EPA has jurisdiction over the above-captioned matter, as described in Paragraphs 1 and 2, above.
4. EPA has consulted with the Commonwealth of Pennsylvania (Pennsylvania) Department of Environmental Protection (PADEP) regarding this action and, subsequent to the Effective Date, EPA will mail a copy of this fully executed AOCC to the appropriate PADEP representative.

II. GENERAL PROVISIONS

5. For the purpose of this proceeding only, Respondents admit each jurisdictional allegation set forth in this AOCC.
6. Except as provided in Paragraph 5, above, Respondents neither admit nor deny the specific factual allegations set forth in Section IV (FINDINGS OF FACT AND CONCLUSIONS OF LAW) of this AOCC, below.
7. Respondents agree not to contest the jurisdiction of EPA with respect to the execution or enforcement of this AOCC.
8. For purposes of this proceeding only, Respondents agree to the terms and issuance of this AOCC and hereby expressly waive any rights they may have, jointly or severally, to contest the allegations set forth in this AOCC.
9. The provisions of this AOCC shall apply to and be binding upon each Respondent and its officers, directors, employees, contractors, agents, trustees, successors and assigns of that Respondent.
10. Respondents shall bear their own costs and attorney's fees in connection with this proceeding and associated with the implementation or enforcement of this AOCC, including any costs related to resolution of any dispute arising regarding this AOCC.
11. Issuance of this AOCC is intended to address the violations described herein. EPA reserves the right to commence action against any person, including each Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. EPA also reserves any existing rights and remedies available to it under the CWA, 33 U.S.C. §1311, et seq., the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction. Further, EPA reserves any rights and remedies available to it under the CWA, the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this AOCC, following the Effective Date, as defined below.
12. This AOCC shall not be construed to require Respondents to continue to operate the WWTP in its entirety. Unless or until this AOCC is modified or terminated, in accordance with the terms of this AOCC, any complete shutdown, change of ownership or change in operation of the WWTP shall not relieve Respondents of any obligations under this AOCC.
13. To the extent that any obligation under this AOCC requires either Respondent to obtain a federal, state, or local permit or approval, Respondents are responsible for submitting timely and complete applications and taking all other actions necessary to obtain all such permits or approvals.
14. This AOCC does not constitute a waiver or modification of the terms or conditions of any permit issued to either Respondent. Nothing in this Order shall relieve either Respondent of its obligation to comply with all applicable provisions of federal, state, or local laws and regulations, nor shall it restrict EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state or local permit. This Order does not constitute a waiver, suspension or

modification of the requirements of the Act, 33 U.S.C. §§ 1251 et seq., or any regulations promulgated thereunder.

15. Respondents waive any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that either Respondent may have with respect to any issue of fact or law set forth in this AOCC, including any right of judicial review pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.
16. EPA reserves all existing inspection authority otherwise available to EPA pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, or pursuant to any other statute or law.
17. The undersigned representative of each Respondent certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this AOCC and to execute and legally bind the party.
18. By signing this AOCC, each Respondent acknowledges that this AOCC may be available to the public and represents that, to the best of Respondent's knowledge and belief, this AOCC does not contain any confidential business information or personally identifiable information from Respondent.
19. Each Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter was, at the time of submission was true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by either Respondent to the EPA regarding matters relevant to this AOCC are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Each Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

III. STATUTORY AND REGULATORY BACKGROUND

20. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant by any person except in compliance with sections 301, 302, 306, 307, 318, 402, and 404 of the Act.
21. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the National Pollutant Discharge Elimination System (NPDES) program for the discharge of pollutants from point sources to waters of the United States. The discharges are subject to specific terms and conditions as prescribed in the permit. Section 402(b) of the Act, 33 U.S.C. § 1342(b), provides for the authorization of state programs to issue NPDES permits.
22. "Discharge of a pollutant" means "[a]ny addition of any 'pollutant' or combination of pollutants to 'waters of the United States' from any 'point source'." 40 C.F.R. § 122.2 *See also* 33 U.S.C. § 1362(12).

23. Pursuant to Section 402(b) of the Act, 33 U.S.C. § 1342(b), during 1978, EPA first authorized Pennsylvania to issue NPDES permits and such authority was re-authorized during 1991.

IV. FINDINGS OF FACT AND JURISDICTIONAL ALLEGATIONS

24. Respondents are each a “person” within the meaning of Section 502(5) of the Act, 33 U.S.C. § 1362(5).
25. At all times relevant to this AOCC, Respondents, jointly or severally, owned and operated the York Wastewater Treatment Plant (the WWTP or Facility), a publicly-owned wastewater treatment plant located in Manchester Township, York County, PA. Treated domestic, commercial, and industrial wastewater is discharged from the WWTP to Codorus Creek.
26. At all times relevant to this AOCC, the operation of the WWTP has been subject to the Pennsylvania Department of Environmental Protection (PADEP) issued NPDES Discharge Permit No. PA0026263 (the Permit), which became effective on September 1, 2017.
27. Respondents are authorized to discharge pollutants wastewater from the WWTP to waters of the United States only in accordance with the terms and conditions of the Permit.
28. Codorus Creek is a tributary of the Susquehanna River in York County, Pennsylvania, and both Codorus Creek and the Susquehanna River are “waters of the United States” within the meaning of Section 502(7) of the Act, 33 U.S.C. § 1362(7).
29. At all times relevant to this AOCC, wastewater was discharged from the WWTP into Codorus Creek through a “point source” as that term is defined at Section 502(14) of the Act, 33 U.S.C. § 1362(14).
30. On May 29, 2019, representatives of EPA inspected the WWTP for purposes of determining compliance with the Permit (the Inspection).
31. Part A.I.A. of the Permit defines effluent limitations, monitoring, recordkeeping, and reporting requirements for discharges from Outfall 001 of the WWTP. During January 1, 2017 through May 31, 2019, the WWTP experienced 42 effluent limit exceedances from Outfall 001 during bypass events. A summary of the 42 Outfall 001 exceedances at issue is set forth in Table 1, below.

Monitoring Period Start Date	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Statistical Base Code
3/1/2019	3/31/2019	Ammonia-Nitrogen	3.9	2.1	mg/L	Average Monthly
3/1/2019	3/31/2019	Carbonaceous Biochemical Oxygen Demand (CBOD5)	33.0	30.0	mg/L	Weekly Average
3/1/2019	3/31/2019	Carbonaceous Biochemical Oxygen Demand (CBOD5)	33.0	20.0	mg/L	Average Monthly
3/1/2019	3/31/2019	Dissolved Oxygen	3.6	5.0	mg/L	Minimum

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Table 1. Outfall 001 Final Effluent Exceedances (January 1, 2017 through July 31, 2020)						
Monitoring Period Start Date	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Statistical Base Code
3/1/2019	3/31/2019	Total Phosphorus	3.5	2.0	mg/L	Average Monthly
3/1/2019	3/31/2019	Total Residual Chlorine (TRC)	1.00	0.44	mg/L	Instantaneous Maximum
3/1/2019	3/31/2019	Total Residual Chlorine (TRC)	0.56	0.13	mg/L	Average Monthly
3/1/2019	3/31/2019	Total Suspended Solids	65.0	45.0	mg/L	Weekly Average
3/1/2019	3/31/2019	Total Suspended Solids	65.0	30.0	mg/L	Average Monthly
11/1/2018	11/30/2018	Ammonia-Nitrogen	3.3	2.1	mg/L	Average Monthly
11/1/2018	11/30/2018	Dissolved Oxygen	3.3	5.0	mg/L	Minimum
11/1/2018	11/30/2018	Total Phosphorus	2.5	2.0	mg/L	Average Monthly
11/1/2018	11/30/2018	Total Residual Chlorine (TRC)	0.97	0.13	mg/L	Average Monthly
11/1/2018	11/30/2018	Total Residual Chlorine (TRC)	2.52	0.44	mg/L	Instantaneous Maximum
9/1/2018	9/30/2018	Ammonia-Nitrogen	7.2	1.7	mg/L	Average Monthly
9/1/2018	9/30/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	28.5	13.0	mg/L	Average Monthly
9/1/2018	9/30/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	28.5	19.0	mg/L	Weekly Average
9/1/2018	9/30/2018	Dissolved Oxygen	2.4	5.0	mg/L	Minimum
9/1/2018	9/30/2018	Total Phosphorus	5.5	2.0	mg/L	Average Monthly
9/1/2018	9/30/2018	Total Residual Chlorine (TRC)	1.22	0.13	mg/L	Average Monthly
9/1/2018	9/30/2018	Total Residual Chlorine (TRC)	2.58	0.44	mg/L	Instantaneous Maximum
9/1/2018	9/30/2018	Total Suspended Solids	32.5	30.0	mg/L	Average Monthly
8/1/2018	8/31/2018	Ammonia-Nitrogen	2.8	1.7	mg/L	Average Monthly
8/1/2018	8/31/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	27.0	19.0	mg/L	Weekly Average
8/1/2018	8/31/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	27.0	13.0	mg/L	Average Monthly
8/1/2018	8/31/2018	Dissolved Oxygen	2.6	5.0	mg/L	Minimum
8/1/2018	8/31/2018	Fecal Coliform	201	200	No./100 ml	Geometric Mean
8/1/2018	8/31/2018	Total Phosphorus	2.4	2.0	mg/L	Average Monthly
8/1/2018	8/31/2018	Total Residual Chlorine (TRC)	0.24	0.13	mg/L	Average Monthly
8/1/2018	8/31/2018	Total Residual Chlorine (TRC)	0.76	0.44	mg/L	Instantaneous Maximum

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Table 1. Outfall 001 Final Effluent Exceedances (January 1, 2017 through July 31, 2020)						
Monitoring Period Start Date	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Statistical Base Code
8/1/2018	8/31/2018	Total Suspended Solids	61.0	45.0	mg/L	Weekly Average
8/1/2018	8/31/2018	Total Suspended Solids	61.0	30.0	mg/L	Average Monthly
7/1/2018	7/31/2018	Ammonia-Nitrogen	5.3	1.7	mg/L	Average Monthly
7/1/2018	7/31/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	34.5	13.0	mg/L	Average Monthly
7/1/2018	7/31/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	34.5	19.0	mg/L	Weekly Average
7/1/2018	7/31/2018	Dissolved Oxygen	2.9	5.0	mg/L	Minimum
7/1/2018	7/31/2018	Fecal Coliform	48392	1000	No./100 ml	Instantaneous Maximum
7/1/2018	7/31/2018	Fecal Coliform	12869	200	No./100 ml	Geometric Mean
7/1/2018	7/31/2018	Total Phosphorus	6.3	2.0	mg/L	Average Monthly
7/1/2018	7/31/2018	Total Suspended Solids	49.3	30.0	mg/L	Average Monthly
7/1/2018	7/31/2018	Total Suspended Solids	49.3	45.0	mg/L	Weekly Average
7/1/2017	7/31/2017	Ammonia-Nitrogen	7.1	1.7	mg/L	Average Monthly

32. Part A.I.B. of the Permit defines effluent limitations, monitoring, recordkeeping, and reporting requirements for Outfall 002 discharges. During September 1, 2017 and May 31, 2019, the WWTP experienced nine (9) effluent limit exceedances from Outfall 002. A summary of the nine (9) Outfall 002 exceedances at issue is set forth in Table 2, below.

Table 2. Outfall 002 Final Effluent Exceedances (January 1, 2017 through July 31, 2020)						
Monitoring Period Start Date	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Statistical Base Code
7/1/2020	7/31/2020	Fecal Coliform	1307	1000	No./100 ml	Instantaneous Maximum
7/1/2020	7/31/2020	Total Phosphorus	2.6	2.0	mg/L	Average Monthly
7/1/2020	7/31/2020	Ammonia-Nitrogen	3.8	1.7	mg/L	Average Monthly
5/1/2020	5/31/2020	Fecal Coliform	2420	1000	No./100 ml	Instantaneous Maximum
8/1/2019	8/31/2019	Carbonaceous Biochemical Oxygen Demand (CBOD5)	24.5	19.0	mg/L	Weekly Average
8/1/2019	8/31/2019	Fecal Coliform	24196	1000	No./100 ml	Instantaneous Maximum
5/1/2019	5/31/2019	Fecal Coliform	2420	1000	No./100 ml	Instantaneous Maximum
9/1/2018	9/30/2018	Fecal Coliform	12100	1000	No./100 ml	Instantaneous Maximum

Table 2. Outfall 002 Final Effluent Exceedances (January 1, 2017 through July 31, 2020)						
Monitoring Period Start Date	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Statistical Base Code
8/1/2018	8/31/2018	Fecal Coliform	12098	1000	No./100 ml	Instantaneous Maximum
7/1/2018	7/31/2018	Carbonaceous Biochemical Oxygen Demand (CBOD5)	24.6	19.0	mg/L	Weekly Average
7/1/2018	7/31/2018	Fecal Coliform	48392	1000	No./100 ml	Instantaneous Maximum
5/1/2018	5/31/2018	Ammonia-Nitrogen	4.9	1.7	mg/L	Average Monthly
4/1/2018	4/30/2018	Ammonia-Nitrogen	3.4	2.1	mg/L	Average Monthly
1/1/2018	1/31/2018	Ammonia-Nitrogen	2.8	2.1	mg/L	Average Monthly
9/1/2017	9/30/2017	Fecal Coliform	3873	1000	No./100 ml	Instantaneous Maximum

33. Part B.I.E.2. states: “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms of and conditions of this permit.” During the Inspection, EPA Inspectors observed the following incidents of operational malfunction of the Facility, which prohibited Respondents compliance with the terms of and conditions of the Permit.
- a. Several pieces of equipment that contribute to the full treatment capacity of the WWTP were either out of service or partially functioning. As described in detail in the Inspection Report, the equipment that was either out of service or partially functioning included: i) an influent channel, ii) Primary Clarifiers No. 1, 3 and 5, iii) one of three screw pumps that convey wastewater from the Train #2 secondary clarifiers to the sand filters, iv) the sand filters, v) the automatic chlorine injection system and vi) the Facility supervisory control and data acquisition (SCADA) system.
 - b. The secondary treatment units were malfunctioning based upon the presence of:
 - a) scum and floatable solids accumulated in the secondary clarifiers of Train #2,
 - b) foam in the anoxic basins at the effluent of the BNR systems for Trains #2 and #3 and c) algae and vegetation on and around the step aerator at Outfall 002.
 - c. The WWTP’s computerized maintenance management system was functioning was limited resulting in deficiencies in tracking of maintenance activities, including failure to complete work orders generated during the past year.
34. Part C.V.E. of the Permit states, “At an influent flow rate of 53 MGD or higher, the Train #2 Secondary Clarifier effluent, bypassing existing sand filters and UV disinfection system, may be discharged to Codorus Creek via Outfall 001, contingent upon compliance with effluent limitations and monitoring requirements identified in Part A of this permit. Except for the Train #2 Secondary Clarifier effluent and stormwater, discharge of other wastewaters via Outfall 001 is prohibited.” During the Inspection, EPA

Inspectors were informed that to protect the biota in the biological nutrient removal systems, these systems are typically taken offline (i.e. there was no treatment of the influent, only flow through of the influent occurred) during wet weather events as influent flows increased near to 25 to 26 MGD. During July 2018 through May 2019, this practice resulted in at least five bypass events whereby a mixture of stormwater, groundwater and partially treated wastewater was discharged from Outfall 001 to Codorus Creek.

V. CONCLUSIONS OF LAW AND FINDINGS OF VIOLATION

35. The allegations set forth in Paragraphs 1-34, above, are incorporated herein.
36. Based on the above assertions and allegations, EPA concludes that Respondents violated Part A.1.A. of the Permit on the dates set forth in Table 1, above.
37. Based on the above assertions and allegations, EPA concludes that Respondents violated Part A.1.B. of the Permit on the dates set forth in Table 2, above.
38. Based on the above assertions and allegations, EPA concludes that Respondents violated Part B.I.E.2. of the Permit prior and subsequent to May 29, 2019.
39. Based on the above assertions and allegations, EPA concludes that Respondents violated Part C.V.E. of the Permit prior and subsequent to May 29, 2019.
40. Based on the above assertions and allegations in Paragraphs 1-39, above, Respondents have failed to comply with the terms and conditions of the Permit and, therefore, have violated Section 301 of the CWA, 33 U.S.C. § 1311.

VI. COMPLIANCE ORDER

Therefore, Respondents are hereby ORDERED, pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), and consent to conduct the following activities:

41. Within 180 days of the Effective Date, the Respondents shall certify to EPA that: a) it has retained the services of at least one certified operator, who has been granted the authority to make process control decisions at the Facility, b) such certified operator is Board-certified with a valid certificate with the appropriate class and subclassifications for the Facility and is designated by the owner as an available operator, in accordance with 25 Pa. Code § 302.104 (Certification Requirements) and c) has made arrangements to ensure oversight of the Facility by such certified operator(s) at all times. Respondents shall include a copy of each certified sewage treatment plant operator's certificate as an attachment to the Certification of Certified WWTP Operator(s) at the Facility.
42. On or prior to the dates set forth below, Respondents shall complete each of the following WWTP capital improvement projects (York AOCC Compliance Projects) in accordance with this AOCC, including the EPA approved York AOCC Implementation Plan, and submit a York AOCC Compliance Project Completion Notification to EPA in accordance with this AOCC:

Appendix A-20-f

- a. York AOCC Compliance Project #1: Primary Clarifier Overhaul – Hydraulic Improvements Project
Deadline for submission of York AOCC Compliance Project #1 Completion Notification to EPA: June 30, 2021.
- b. York AOCC Compliance Project #2: Primary Clarifier Pump Station Upgrades Project
Deadline for submission of York AOCC Compliance Project #2 Completion Notification: June 30, 2021.
- c. York AOCC Compliance Project #3: Scum Removal System Repair Project
Deadline for submission of York AOCC Compliance Project #3 Completion Notification: June 30, 2021.
- d. York AOCC Compliance Project #4: Screw Pump Replacement Project
Deadline for submission of York AOCC Compliance Project #4 Completion Notification: December 31, 2024.
- e. York AOCC Compliance Project #5: Tertiary Filter Replacement Project
Deadline for submission of York AOCC Compliance Project #5 Completion Notification: December 31, 2021.
- f. York AOCC Compliance Project #6: SCADA System & Instrumentation & Controls & Replacement & Improvements Project
Deadline for submission of York AOCC Compliance Project #6 Completion Notification: December 31, 2022.
- g. York AOCC Compliance Project #7: Work Order System Implementation Project
Deadline for submission of York AOCC Compliance Project #7 Completion Notification: June 30, 2023.
- h. York AOCC Compliance Project #8: Manual Chlorination – 001 EFF Project
Deadline for submission of York AOCC Compliance Project #8 Completion Notification: June 30, 2026.
- i. York AOCC Compliance Project #9: No Dechlorination – 001 EFF Project
Deadline for submission of York AOCC Compliance Project #9 Completion Notification: June 30, 2026.
- j. York AOCC Compliance Project 10 – “Infiltration/Inflow Removal – WWTP”
Deadline for submission of York AOCC Compliance Project #10 Completion Notification: June 30, 2025.
- k. York AOCC Compliance Project #11: UV Disinfection System Replacement & Building Renovations
Deadline for submission of York AOCC Compliance Project #11 Completion Notification: December 31, 2025.

43. Implementation Plan: Within sixty (60) days of the Effective Date, Respondents shall submit to EPA for review a York AOCC Implementation Plan (the York AOCC Implementation Plan), which meets the requirements set forth in this AOCC. The York AOCC Implementation Plan shall include, at a minimum, the following:
- a. A primary point of contact, who represents the Respondents jointly, for all EPA communications regarding this AOCC. Such information shall include such person's: name, title, mailing and email addresses and direct dial phone number. Respondents' assigned primary point of contact shall not be reviewable by EPA and shall not be subject to EPA approval or disapproval.
 - b. A detailed description of each York AOCC Compliance Project (e.g. York AOCC Project #4 Detailed Description), including a description to all planned or necessary changes to the Facility.
 - c. A detailed description of the project management process for completing each York AOCC Compliance Project (e.g. York AOCC Project #4 Project Management Process), including an identification and description of any compliance project related training, permits required by PADEP or local authorities, studies, interim reports, monitoring and sampling analysis reports.
 - d. A detailed schedule for completion of each York AOCC Compliance Project listed in this AOCC, including timelines and interim milestones (York AOCC Project Detailed Schedule) (e.g. York AOCC Project #4 Detailed Schedule). Respondents shall review each York AOCC Project Detailed Schedule on a quarterly basis prior to submission of any York AOCC Compliance Project Progress Report, required pursuant to this AOCC. Respondents shall submit any requests for revisions to any EPA-approved York AOCC Project Detailed Schedule in accordance with Paragraph 45 of this AOCC, below.
 - e. A detailed schedule for providing and completing training for staff and management for any new system or process related to each York AOCC Compliance Project (York AOCC Project Training Schedule) (e.g. York AOCC Project #4 Project Training Schedule).
 - f. A detailed schedule for providing and completing any progress reports required by this AOCC and any sampling analysis, studies or interim reports identified in the proposed detailed description of the project management process for any York AOCC Compliance Project.
 - g. A format for the following submissions required pursuant to this AOCC: i) York AOCC Compliance Projects Progress Reports and ii) York AOCC Compliance Project Completion Notifications.
44. Respondents shall comply with, fully implement and undertake all work described in the EPA approved York AOCC Implementation Plan.
45. Progress Reports: Respondents shall submit to EPA progress reports (York AOCC Compliance Projects Progress Reports) in accordance with this AOCC.
46. York AOCC Compliance Projects Progress Reports

- a. Each York AOCC Compliance Project Progress Report shall include sufficient information to document compliance with this AOCC, including the EPA approved York AOCC Implementation Plan, for each York AOCC Compliance Project. For each York AOCC Compliance Project, each York AOCC Compliance Project Progress Report shall include, at a minimum: a listing of submissions to EPA during the reporting period and a clear indication of compliance or noncompliance with each milestone, including any compliance project related training, studies undertaken or completed, interim reports undertaken or submitted to EPA, project summary reports submitted to EPA, photographs relevant to documenting compliance with this AOCC, including the EPA approved York AOCC Implementation Plan, monitoring undertaken and sampling analysis reports submitted to EPA, as set forth in the EPA approved York AOCC Implementation Plan.
 - b. Each York AOCC Compliance Project Progress Report shall confirm, or provide an update for, the name and contact information (mailing and email addresses and direct dial phone number) for the person assigned as the primary point of contact, who represents the Respondents jointly, for all EPA communications regarding this AOCC.
 - c. For each York AOCC Compliance Project for which Respondents have not submitted a York AOCC Compliance Project Completion Notification, each York AOCC Compliance Project Progress Report shall include either: i) confirmation of compliance with the respective EPA-approved York AOCC Project Detailed Schedule or ii) a proposed revised York AOCC Project Detailed Schedule for EPA's review for such York AOCC Compliance Project (Proposed York AOCC Project #4 Detailed Schedule Revision) (e.g. Proposed York AOCC Project #4 Detailed Schedule Revision).
 - d. Respondents shall submit the initial York AOCC Compliance Project Progress Report no later than the last day of the first calendar quarter following the Effective Date, as defined in this AOCC.
 - e. Respondents shall submit each subsequent York AOCC Compliance Project Progress Report on a calendar quarterly basis and no later than each subsequent March 30th, June 30th, September 30th and December 30th, prior to termination of this AOCC.
47. Project Completion Notifications: For each York AOCC Compliance Project, Respondents shall submit to EPA for review and approval a notification of completion of such project (Proposed York AOCC Compliance Project Completion Notification) in accordance with this AOCC. Within 30 calendar days of completion of each York AOCC Compliance Project, listed in this AOCC, Respondents shall submit a Proposed York AOCC Compliance Project Completion Notification. Each Proposed York AOCC Compliance Project Completion Notification shall include sufficient information to document compliance with this AOCC and completion of such York AOCC Compliance Project in accordance with the terms of this AOCC, including the EPA approved the York AOCC Implementation Plan.

VII. PROCEDURES FOR SUBMISSIONS

48. All documents required to be submitted by this Order and any Request for Termination shall be accompanied by a certification signed by a responsible officer, as defined in 40 CFR § 122.22(d), that reads as follows:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signed _____

Title: _____

Date: _____

49. Each Respondent may assert a business confidentiality claim covering part or all of the information which this AOCC requires it to submit to EPA, but only to the extent and only in the manner described in Part 2 Subpart B of Title 40 of the C.F.R. The EPA will disclose information submitted under a confidentiality claim only as provided in Part 2 Subpart B of Title 40 of the C.F.R. If, at the time any information is submitted to EPA, the Respondent submitting such information does not assert a confidentiality claim, EPA may make the submitted information available to the public without further notice to either Respondent.
50. Unless otherwise directed in writing, Respondents shall submit any submission or written communication, including any accompanying data, relating to this AOCC either via: a) email or b) mail if email communication is not reasonably available to:

Email: McLaughlin.Kaitlin@epa.gov

Mail: Ms. Kaitlin McLaughlin

NPDES Inspector (Mailcode: 3ED32)

Enforcement and Compliance Assurance Division

U.S. EPA, Region III

1650 Arch Street, Philadelphia, PA 19103-2029

Any information submitted electronically shall be submitted in a widely recognized electronic format.

51. Review of Submissions:
- a. Except for any York AOCC Compliance Projects Progress Report, for each submission required pursuant to this AOCC, including required pursuant to the EPA-approved York AOCC Implementation Plan, EPA, in its sole and unreviewable discretion, may in writing: (i) approve such submission in whole or in part; (ii) approve such submission upon specified conditions; (ii) modify such submission to

- cure any deficiencies; (iii) disapprove such submission, in whole or in part, or (iv) any combination of the above.
- b. If such submission is approved, Respondents shall take all actions required by the EPA approved submission, in accordance with the schedules and requirements set forth in such approved submission or EPA's written notification of approval. If such submission is conditionally approved or approved only in part, Respondents shall, upon written direction from EPA, take all actions required by any EPA approved portion of such submission that EPA determines is technically severable from any portion requiring further EPA review or disapproved by EPA.
 - c. If EPA disapproves such submission in whole or in part, Respondents shall, within thirty (30) calendar days or such other time as EPA determines appropriate, correct all deficiencies and resubmit such disapproved portion of such submission for approval, in accordance with this AOCC.
 - d. After review of any document resubmitted in accordance with Paragraph 51.c., above EPA will notify Respondents in writing that such resubmission is approved, disapproved or revised in whole or part. If the resubmission is approved, in whole or in part, Respondents shall proceed in accordance with Paragraph 51.b., above. If any portion of such resubmission is disapproved, EPA may again require Respondents to correct any deficiencies, in accordance with Paragraph 51.c., above, or EPA may revise such document and correct any deficiencies and notify Respondents to take all actions required by such revised resubmission.
52. Subsequent to EPA approval of any plan, schedule or other document required to be submitted to EPA, pursuant to the Section VI (Compliance Order) of this AOCC, Respondents may seek EPA's review of revisions to such previously EPA approved document. The provisions of this Section shall apply to any request for any revision of any EPA approved document and any revised submission.

**VIII. CERTIFICATION OF COMPLIANCE AND
REQUEST FOR TERMINATION OF AOCC**

53. Upon completion of all York AOCC Compliance Projects required pursuant to this AOCC and submission of all required York AOCC Compliance Project Completion Notification, including sufficient information to document compliance with this AOCC and completion of each York AOCC Compliance Project in accordance with the terms of this AOCC, Respondents shall submit to EPA a Certification of Compliance and Request for Termination of this AOCC. Such certification and request shall include:
- a. a certification that Respondents have maintained compliance with this AOCC for the term of this AOCC and
 - b. all necessary documentation, including photo documentation as appropriate, to support a finding that Respondents have complied with Section VI (Compliance Order) of this AOCC.
54. If, following review of any Certification of Compliance and Request for Termination of this AOCC, EPA agrees that Respondents have adequately complied with all

requirements of this AOCC, then EPA may, in its unreviewable discretion, provide written notification of termination of this AOCC.

IX. EXTENSION OF TIME REQUEST BASED ON FORCE MAJEURE EVENT

55. "Force Majeure Event", for purposes of this AOCC, is defined as any event arising from causes beyond the control of either Respondent, of any entity controlled by either Respondent or any contractor of either Respondent, that delays or prevents the performance of any obligation under this AOCC subsequent to Respondents exercising best efforts to fulfill the obligation(s) at issue. The requirement that Respondents exercise "best efforts to fulfill the obligation" includes using best efforts to anticipate any potential Force Majeure Event and best efforts to address the effects of any such event: (a) as it is occurring and (b) after it has occurred, to prevent or minimize any resulting delay. Unanticipated or increased costs or expenses associated with the performance of Respondents' obligations under this AOCC or Respondents' financial inability to perform any obligation under this AOCC shall not constitute circumstances beyond Respondents' control nor serve as the basis for an extension of time under this AOCC.
56. If at any time during the implementation of this AOCC, any Force Majeure Event occurs that may delay the performance of any obligation under this AOCC, including implementation of an EPA approved plan or schedule, Respondents shall, within three (3) calendar days of determining that such event may delay the performance of such obligation, provide to EPA a written request for an extension of time to comply with any such obligation (Extension of Time Request). Such Extension of Time Request shall include, at a minimum, the following information for each specific obligation(s) for which an extension of time is sought.
- a. The specific obligation(s) for which an extension of time is sought, including each applicable deadline.
 - b. A detailed explanation and description of the Force Majeure Event at issue and the reasons for the requested extension of time, including all supporting documentation.
 - c. The amount of time for which an extension of time is sought.
 - d. A detailed description of all actions taken to prevent or minimize the amount of time for which an extension of time is sought, including a detailed description of each Respondent's best efforts to fulfill the obligation.
 - e. A detailed description, including a schedule for implementation, of all actions to be taken to prevent or mitigate the amount of time for which an extension is sought and the effect of any delay on any other obligation pursuant to this AOCC.
 - f. A statement as to whether, in the opinion of each Respondent, the Force Majeure Event at issue may cause or contribute to an endangerment to public health, welfare, or the environment.
57. Respondents shall be deemed to know of the occurrence of, or reasonable likelihood of an occurrence of, any circumstance or event that may delay the performance of any

obligation under this AOCC of which either Respondent, any entity controlled by either Respondent, or any contractor of either Respondent knew or should have known.

58. Any Extension of Time Request shall be submitted in accordance with this AOCC and shall be subject to the procedures for review of submissions as set forth in this AOCC.
59. EPA may, in its unreviewable discretion, approve or disapprove any Extension of Time Request.
60. EPA's approval, including conditional approval, of any Extension of Time Request shall not, of itself extend the time for performance of any other obligation not explicitly addressed in such approval.
61. Failure to comply with the above requirements may preclude Respondents from asserting any claim of Force Majeure or other related defense for non-compliance with the terms of this AOCC for the time period such non-compliance is related to a reportable event.

X. AOCC MODIFICATIONS

62. Any request to modify the terms of, or parties to, this AOCC shall be submitted, in writing, by Respondents to EPA and shall be subject to review and approval by EPA, in its sole and unreviewable discretion. Respondents' submission of a written request for modification of this AOCC shall not relieve Respondents of any obligation under this AOCC and shall have no effect on EPA's statutory or regulatory authority to enforce the terms of this AOCC, in its sole and unreviewable discretion.

XI. CHANGE OF OWNERSHIP OR OPERATION OF THE WWTP

63. Until or unless this AOCC is modified or terminated, in accordance with the terms of this AOCC, Respondents shall, jointly and severally, remain responsible for compliance with the terms of this AOCC following any transfer of ownership or operation of the WWTP.
64. At least ninety (90) days prior to any transfer of ownership or operation of the WWTP, Respondents shall submit a written notification to EPA of any such anticipated change in ownership or operation of the WWTP (Notification of Change of York WWTP Ownership or Operation). Each such Notification of Change of York WWTP Ownership or Operation shall include, at a minimum, a detailed summary of the anticipated change in ownership or operation, contact information for the proposed new owner or operator of the WWTP and a schedule for such anticipated change.
65. Respondents shall condition any sale or transfer of ownership or operation of the WWTP, in whole or in part, upon the execution by such Prospective Third Party Purchaser, or Transferee, of an agreement, which creates an obligation that shall survive the closing of such sale or transfer, of the WWTP, whereby such Prospective Third Party Purchaser or Transferee agrees to comply with and be bound by the terms of this AOCC.

XII. EFFECTIVE DATE

66. This AOCC will become effective upon the Sewer Authority's receipt of a fully-executed copy of this AOCC.

Matter of City of York and City of York Sewer Authority, Docket No. CWA 03-2021-0044DN

FOR CITY OF YORK SEWER AUTHORITY

By: _____

Name: _____

Title: _____

Date: _____

FOR CITY OF YORK, PENNSYLVANIA

By: _____

Name: _____

Title: _____

Date: _____

SO ORDERED:

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: _____

By: _____

Karen Melvin, Director
Enforcement & Compliance Assurance Division
U.S. Environmental Protection Agency
Region III