



Aspinwall WTP 2023 Environmental Compliance Audit

Corrective Action Report

February 2024

Environmental Compliance Audit

- Arcadis, as the Independent Environmental Consultant, performed the required annual environmental compliance audit of the Aspinwall Water Treatment Plant
 - Field audit was performed October 23-25, 2023.
- The final audit report was made publicly available and posted on PWSA's website on January 5, 2024.
- PWSA has implemented corrective actions as outlined in this report which will be made publicly available on PWSA's public website.

Air Quality

Complete
In-Progress
Not Started

Finding/Comment

- First Half Semi-Annual Emergency Generator Air Permits Reports do not include 12-month rolling totals of operating hours
- Reporting period on the 2022 Annual Compliance Certification listed the dates as January, 1 2021 through December 31, 2021 rather than January 1, 2022 through December 31, 2022

Corrective Action

- 2023 Second half semi-annual generator report included a 12-month rolling total of operating hours.
- Reporting period dates were corrected in most recent annual compliance certification.

Air Quality

Complete
In-Progress
Not Started

Finding/Comment
<ul style="list-style-type: none">• The Delval Boiler Service Report for 2023 indicates an incorrect date for service performed in February 2023• Permit Condition 12 of Air Quality Permit 0117-OP21 requires that the annual compliance certification submitted to the Allegheny County Health Department (ACHD) list each condition of the permit and compliance status associated with the given requirement. However, the form that the ACHD provides to meet this condition only indicates for the facility to list any conditions that were not in compliance and allows global certification of compliance for requirements in compliance

Corrective Action
<ul style="list-style-type: none">• Delval issued revised report with correct date which was submitted in the 2023 second half semi-annual report to ACHD.• Permit Condition 12 cannot be addressed by PWSA, PWSA is using the form provided by ACHD. PWSA will review this finding with ACHD during the next permit renewal cycle.

Chemical Management

Complete
In-Progress
Not Started

Finding/Comment

- Unlabeled 5-gallon jerricans of sodium hypochlorite in the Hypo Building
- In Aspinwall PS external garage, there are propane tanks that did not fit in the storage cages were strapped to the stored cages with a bungee cord
- Spill Kit in Boiler Room of Ross PS was missing tamper seal

Corrective Action

- 5-gallon jerricans of sodium hypochlorite are now labeled 'for transfer' only.
- PWSA had storage cages built for empty and full propane tanks.
- Tamper seal for spill kit in boiler room of Ross PS has been addressed.



Chemical Management

Complete
In-Progress
Not Started

Finding/Comment

- Hazardous label was missing on Kerosene tank in Ross PS mezzanine
- The cabinet used to collect spent/obsolete basic chemicals in the Laboratory and the waste oil drums in the maintenance shop were blocked and would be hard to access during an emergency

Corrective Action

- Flammable sign is now provided on kerosene drum. Drum is still in use.
- Aisleway blocking the flammable cabinets in the laboratory has been cleared.



Waste Management

Complete
In-Progress
Not Started

Finding/Comment
<ul style="list-style-type: none">• Labels on hazardous waste drums in the North Garage did not have the hazardous properties identified• Absorbent pads in the Hypo Building were found in the municipal waste• Waste Management Plan did not include management of chemicals being sent for Beneficial Use

Corrective Action
<ul style="list-style-type: none">• Drums being used for storage of hazardous waste have hazard labels• Tailgate training was conducted on 1/29/24 to clarify that spill absorbent mats (saturated, semi-dry or dry) should not be placed in general plant trash. This is to avoid confusion regarding what the absorbent may have been used for when handling or disposing of plant trash.• Chemicals being sent for beneficial re-use are not being handled as a waste and as such were not previously included in the Waste Management Plan. A discussion of beneficial reuse will be added in the next revision of the Waste Management Plan.

Waste Management

Complete
In-Progress
Not Started

Finding/Comment
<ul style="list-style-type: none">• Lack of documentation that staff have been trained on how to inspect waste areas and tanks• Corrections on waste manifests were not initialed and dated

Corrective Action
<ul style="list-style-type: none">• Environmental Compliance team has annual trainings in RCRA hazardous waste/DOT hazmat and AST/UST inspections. Waste and tank trainings beginning in April and May 2023 have been documented.• The Environmental Management Information System includes standard procedures and forms for general inspections that include AST/UST.• PWSA has reviewed manifest corrections associated with pre-printed manifests used by third-party waste management companies, initial/date should be provided to document any changes.

Wastewater

Complete
In-Progress
Not Started

Finding/Comment

- The tag on Backflow Preventors P-16, P-17, P-18, P-19, and P-20 showed an inspection date of 2021 and a smudged 2nd date

Corrective Action

- These backflow preventers had documented inspection dates in the file.
- Smudged tags have been updated with legible dates corresponding to inspection reports.



Stormwater

Complete
In-Progress
Not Started

Finding/Comment
<ul style="list-style-type: none">• Lack of documentation from the DEP authorizing the site to discontinue sampling at Outfall 21 and instead collect the sample from the rain gutter at Inlet Gate House

Corrective Action
<ul style="list-style-type: none">• At the time of the audit (October 2023) PWSA was maintaining sampling at Outfall 21. PWSA indicated to auditors the future plan to disconnect the downspout for collection of separate stormwater from the inlet gatehouse.• PWSA notified DEP via email on 01/24/24 about disconnecting the stormwater downspout from the inlet gatehouse which occurred 1/2/24.

Other Items

Complete
In-Progress
Not Started

Finding/Comment

- Exposed insulation near the electrician's office in the Aspinwall PS, suspected to be asbestos containing material (ACM) but due to age of building
- Health & Safety: Inspection labels on eyewash stations need to be updated, and eyewash stations need to be properly clean and ready for use

Corrective Action

- PWSA is working with licensed asbestos contactor to evaluate the presence of ACM in the Aspinwall PS.
- Safety has implemented eyewash inspection procedures. All eyewash stations are inspected for damage or malfunction and flushed weekly.

Drinking Water – Records Retention

Complete
In-Progress
Not Started

Finding/Comment

- During the drinking water compliance audit (at the Aspinwall WTP) that took place on December 8, 2023, it was discovered that the historical records for certain regulated water quality parameters were incomplete.
- 25 Pa. Code Chapter 109.701(d) indicates that laboratory reports for regulated parameters must be maintained onsite.

Corrective Action

- PWSA has obtained nearly all historical laboratory data from over half a dozen laboratories. Unfortunately, one laboratory was unable to locate historical records upon repeated requests from PWSA.
- Calibration records for turbidimeters - record keeping forms have been improved/modified to incorporate suggestions from the auditor.

Drinking Water – Emergency Response Plan

Complete
In-Progress
Not Started

Finding/Comment

- During the drinking water compliance audit (at the Aspinwall WTP) that took place on December 8, 2023, it was discovered that ERP was updated several times in 2023, however, the date of the last update was not recorded on the plan.

Corrective Action

- The ERP includes a change history section which provides revision dates.

CHANGE HISTORY

Please describe the changes made to this plan since its original development, who made the changes and on what date the changes were incorporated into this plan.

DESCRIPTION OF CHANGE	NAME/TITLE	DATE
Initial Release	Greg Sheffer, P.E. – PWSA Consultant	October 2019
Updates to existing scenarios, addition of cyber-attack scenario, addition of mitigation strategies, inclusion of appendices to provide supporting information	Lee Haller, Deputy Chief of Program Management	9.30.2020
Change ERP to EPA template	Kasey Stewart, Senior Manager, Safety & Security	2021
Emergency Scenario Updates	Kasey Stewart, Senior Manager, Safety & Security	2022
Revision of Emergency Scenarios to delete certain existing emergencies that would not necessitate the activation of the ERP or combine emergencies that have similar actions.	Kasey Stewart, Senior Manager, Safety & Security	2.8.2023