

NPDES Inspection Report – Pretreatment Categorical Industrial User

National Database Information	
Inspection Date: 02/25/2025	Inspection Type: Pretreatment Categorical Industrial User
Entry/Exit Time: 10:15 a.m. / 12:15 p.m.	NPDES ID Number: CDPHE: COP900273, COP900709 EPA: COPF00103 and COPF00104
Inspection ID: 202502_ COP900273 and 202502_ COP900709	
Lead inspector and affiliation: Monica Crosby, EPA Region 8	
Inspector and affiliation: Jennifer Ferrando, EPA Region 8	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: Colorado Energy Management 1500 South Clayton Ave. Brush, Colorado 80723	Mail Report (Electronic Delivery) to: Drew Moots EH&S Specialist dmoots@camsops.com

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Drew Moots, EH&S Specialist (not present)
	Sam Moots, Plant Manager (present, primary lead)
	Kyle Hiner, Operation Manager (present)
Authorized Official(s)	Drew Moots, EH&S Specialist

Areas Evaluated During Inspection		
<u>Permit</u>	Effluent/Receiving Waters	Compliance Schedule
<u>Records/Reports</u>	<u>Flow Measurement</u>	Pollution Prevention
<u>Facility Site Review</u>	<u>Self-Monitoring Program</u>	Laboratory
Stormwater	<u>Operations and Maintenance</u>	<u>Pretreatment</u>

Report Review and Signature		
Drafter Name	Date	Address/Phone Number
MONICA CROSBY Digitally signed by MONICA CROSBY Date: 2025.04.01 11:32:26 -06'00' Monica Crosby	03/11/2025	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202 303-312-6196
Reviewer Name	Date	Address/Phone Number
Jennifer Ferrando	3/12/2025	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202 303-312-6601
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EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2025.04.01 12:25:46 -06'00' Emilio Llamozas	03/26/2025	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202 303-312-6407

Inspection Narrative and Site Description

Introduction

On Tuesday, February 25, 2025, at approximately 10:15 am, the U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) inspectors Monica Crosby and Jennifer Ferrando (inspectors) conducted a pretreatment industrial user (IU) inspection of Colorado Energy Management (CEM or facility), located at 1500 South Clayton Avenue, Brush, Colorado. The purpose of the inspection was to evaluate CEM's compliance with the requirements under 40 C.F.R. Part 423 for the Steam Electric Power Generating Point Source Category. The inspectors met with Mr. Sam Moots, Plant Manager, and Mr. Kyle Hiner, Operation Manager (facility representatives), at the facility's office to have an opening conference and discuss the inspection of the facility. After presenting their inspector credentials and explaining the purpose of the inspection, the inspectors proceeded to ask a series of questions to help evaluate compliance with the requirements under 40 C.F.R. Section 423.17, Pretreatment Standards for New Sources for the Steam Electric Power Generating Point Source Category and the facility's NPDES permits. Colorado Department of Public Health and Environment (CDPHE) had previously issued a permit for the Brush Power LLC – Brush 1, 3, and 4D plants (NPDES number COP900273) and the AltaGas Brush Energy, Inc. – Brush 2 plant (NPDES number COP900709). EPA has also assigned NPDES numbers for these power plants (COPF00103 for Brush 1,3,and 4D; and COPF00104 for Brush 2). In this report, the CDPHE permit numbers are used for simplicity. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.

Facility Description

CEM employs twenty-three people and works seven days a week in two 10-hour shifts. Although the facility typically has four generating units—Brush 1, Brush 2, Brush 3, and Brush 4D—at the time of the inspection, Brush 1 and 3 were not operating. In September 2023, Brush 3 had a turbine wreck that stopped Brush 1 and 3 from operating (Photo 17). According to the facility representatives, Brush 3 will not be able to operate again because of the damage. At the time of the inspection, the facility representatives did not know whether Brush 1 will be brought back into operation; the facility was awaiting an air permit for Brush 1. Brush 1, Brush 2, and Brush 4D are combined cycle systems with cooling towers and natural gas combustion turbines. GIP is the owner of Brush 1, Brush 3, and Brush 4D, which share a single discharge point covered under NPDES Permit No. COP900273. Alliance Energy is the owner of Brush 2, which is covered by NPDES Permit No. COP900709. All generating units are operated by CEM. Excel Energy is the sole consumer of energy. See the figure below for the layout of the separate power-generating units.



The facility's generation of energy is sporadic and is provided upon request by Xcel Energy. According to facility representatives, Xcel Energy provides a portion of its power from wind energy; when wind levels are low, Xcel Energy requests supplemental power from CEM. It takes about 2.5-3 hours from the time of the request for CEM to provide electricity to the utility. The peaking units run for 5-7 hours and then shut down. Generally, the units operate from 4 a.m. to midnight, only occasionally running overnight. There are times when the entire plant will not operate (i.e., generate power) for several weeks, though employees are on site daily from 4 a.m. until midnight. At the time of the inspection, Brush 2 had run twice in the last month, and Brush 4 had run once.

Process Wastewater

The source water for the facility is from the City of Brush. Process wastewaters are generated from cooling tower blowdown, boiler blowdown, reverse osmosis brine, and cleaning the facility. All wastewater flows into common wastewater sumps either through Pit 2 serving Brush 2 or Pit 1 serving Brush 1 and 4D (Photos 14 and 18). Pits 1 and 2 separately discharge into the City's publicly owned treatment works (POTW). Pits 1 and 2 each consist of two chambers; wastewater enters the first chamber ("oily water side"), which has a skimming belt that removes oil from the wastewater.

Wastewater flows under the barrier between the two chambers into the second chamber (“clean water side”) before it is discharged (Photos 12, 13 and 18). Facility representatives stated the oil skimmers are inspected monthly. Collected oil from both pits is transferred into a waste oil tank; when the tank is full, the waste oil is hauled offsite. At the time of the inspection, the tank was less than ⅛ full and was being stored on secondary containment (Photo 15). Brush 4D discharges into Pit 4 (Photo 30) which drains into Pit 1. When asked why Brush 4D has a separate pit, the facility representatives explained that Brush 4D was built later and has the same owners as Brush 1.

The facility uses a two-pass reverse osmosis (RO) system to purify city water for use in the boilers. During the inspection, the inspectors observed the RO systems for Brush 1, 2, and 4D (Photos 1, 20, and 21). The inspectors observed a floor grate over a containment area that receives concentrate from the Brush 2 RO system, which is then directed to Pit 2 (Photo 2). Brush 1 and 4D share an RO unit. There was an old RO system for Brush 4D that was used for the cooling tower, but it has been out of service since 2020, and there are no plans to bring this RO system back online. Facility representatives stated that the RO units are cleaned every three months.

Conductivity serves as the basis for the boiler blowdown. Boiler blowdown and RO backwash can either be released into the pits or recycled to the cooling towers. City water goes through the first RO pass, then flows to the first-pass tank, is then pumped through the second pass, and sent to the second pass tank (Photo 24). During the inspection, inspectors observed a sample panel that continuously monitors the pH of Pits 1 and 2 (Photos 3 and 31). In the event of an abnormal pH, an alarm will go off, notifying emergency contacts via telephone. Blowdown samples are collected via dedicated sample ports for each set of cooling towers to evaluate compliance with permit effluent limits for DMR reporting (Photos 8, 23, and 28). The blowdown lines are equipped with flow meters to monitor discharge flow (Photos 9 and 28).

As part of the inspection, the inspectors observed the cooling towers for the generating units (Photo 29). The cooling tower recirculation water’s conductivity is monitored constantly. Cooling tower conductivity is monitored by a blowdown controller in each plant’s water treatment room. The controller automatically opens a blowdown valve according to conductivity levels. At the time of the inspection, the facility had recently replaced the blowdown controllers with 3D TRASAR® units, which can monitor pH, conductivity, and phosphate for the recirculating cooling tower water (Photos 10 and 26). The manufacturer visits the facility biweekly to inspect the TRASAR® units. The facility representatives stated that in the future, they plan to also use the TRASAR® units for compliance monitoring for cooling tower blowdown.

When the electrical conductivity of water in a cooling tower reaches 2,000 milliohms (1,800 milliohms during the winter), a portion of the recirculation water is blown down (i.e., discharged to the POTW) and replaced with fresh water, thus reducing the overall conductivity of the cooling tower recirculation water. The purpose of blowing the water down is to prevent the interior of the tubes from being coated with silica (referred to as “glassed”), which impacts heat transfer from the tubes. Cooling water from the TRASAR® units enters a floor drain that directs water to the wastewater pits (Photo 11).

Sulfuric acid is used to alter the pH of the cooling tower recirculation water, and Dixichlor is used to chlorinate it to inhibit the growth of bacteria. Depending on the amount of activity, the interior walls of

the cooling towers are cleaned as needed, usually every two to three years. The cooling tower is drained, and the sludge at the bottom is sampled before disposal. All sludge is stored onsite; once the sludge dries, if it is non-hazardous, it is put into a dirt pile. If the analysis indicates the sludge contains hazardous material, it would be hauled offsite for disposal. The facility representatives couldn't recall the last time sludge had to be hauled offsite. The interior walls of the cooling towers are sprayed clean with a pressure washer. A sample of the wastewater is then sent to a lab for testing. Depending on the results, the facility will either haul this waste offsite or discharge it to the POTW if it meets the City's pH limits.

According to facility representatives, there is one boiler on Brush 1, one boiler on Brush 2, and two boilers on Brush 4. Boiler blowdown is necessary to maintain water in the steam turbine system that meets the quality standards established by the facility. The last boiler cleaned at the facility was in the early 2000s. During this infrequent cleaning, all waste is collected and then sampled. Based on the results, the waste is either hauled offsite or discharged to the POTW. A media-style evaporative cooler used for the Brush 2 unit also releases wastewater; salts are left behind in water by evaporation (Photo 16).

The facility uses and stores a variety of chemicals, primarily for water treatment. The inspectors observed the chemicals for Brush 1, 2, and 4D to be within concrete secondary containment (Photos 4 and 25). Similarly, it was noted that chemicals in current use, such as one drum of PowerFilm™ 10000, were on secondary containment (Photo 7). Facility representatives stated that when the drums are empty, the facility will rinse them out and that rinse water goes to the wastewater pits. Each chemical storage room had a self-contained pit that would contain chemical spills and is segregated from the wastewater collection system that discharges to the POTW (Photo 31). The inspectors noticed a new tank inside Brush 4D's plant building that was not yet installed but would be storing PowerFilm™ 10000 within a month after the inspection (Photo 27). In the Brush 1 plant building, oil is stored for usage across the facility (Photo 19). Additional drums that were not being used were stored under cover in an adjacent room. The Brush 1 building also contained a large stainless-steel tank containing sulfuric acid that was observed to be within secondary containment barriers (Photo 22). The acid is used to adjust the pH of the recirculating water for all cooling towers at the facility.

Records Review

CEM provided records to the inspectors before and after the inspection. Inspectors reviewed quarterly DMRs and associated laboratory records, reports, and chains of custody (COCs) from January 1, 2024, through February 1, 2025. The inspectors also reviewed Water Treatment Calibration Work Orders, and the facility's Slug Discharge Control Plan (SDCP). Findings associated with the records review are described below.

Closing and Follow-Up

The inspectors held a closing conference with Mr. Moots and Mr. Hiner on February 25, 2025, at approximately 12:00 p.m. EPA inspectors informed the facility contacts of the preliminary observations that were noted during the inspection. The facility followed up with additional documentation after the inspection on February 25, 2025. On March 7, 2025, EPA emailed the preliminary findings to the facility representatives.

Findings, Corrective Actions and Recommendations

Finding #1: CEM did not notify the City of changes to their discharge.

During the inspection, the facility representatives explained that Brush 1 and 3 have not been in operation since September 2023 due to a turbine wreck on Brush 3. Brush 3 will not be brought back into operation. Whether or not Brush 1 is brought back into operation is to be determined; the facility is currently waiting on an air permit. When asked if the facility notified the POTW of this change, the facility representatives responded, "No." The facility did not notify the POTW due to the uncertainties surrounding the future operation of Brush 1.

Permit Requirement:

COP900273, Part E.1 - Notice of Changed Discharge

"The permittee shall promptly notify the Director of the Water Quality Control Division (Director), EPA, and POTW in advance of any substantial change in the volume or character of pollutants in its discharge, including the listed or characteristic hazardous wastes for which the permittee has submitted initial notification pursuant to 63.13(D)(9) of the Regulations.

40 C.F.R. §403.12(j) states, "*Notification of changed Discharge.* All Industrial Users shall promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under [paragraph \(p\)](#) of this section."

Corrective Action #1:

Notify the POTW that flow has been significantly reduced, along with any other substantial changes to the discharge due to the changes in operation from Brush 1 and 3. According to an email sent from the facility to the EPA on March 27, 2025, the facility has notified the Director of Public Works of the status of Brush 1 and 3. In your response to the EPA, indicate the date that this notification was sent.

Finding #2: Leaking valve discovered in the Dixichlor line

During the inspection, the inspectors observed a leaking valve in the Dixichlor line within the Brush 2 plant building. Accumulated chemicals were observed below the leak. The closest floor drain was approximately 10 feet from the area (Photos 5 and 6). Dixichlor is a biocide with the potential to interfere with biological wastewater treatment processes. The Safety Data Sheet for Dixichlor indicates that the product is corrosive, and mist or vapors may cause respiratory tract irritation. The facility provided the EPA with photos on February 25, 2025, after the inspection, showing the leak had been repaired.

Permit Requirement:

COP900709, Part A.2 – General Prohibitions

The Industrial User shall not introduce into a POTW pollutants that cause pass-through or interference with the operation or performance of the treatment works. This general prohibition and the specific prohibitions listed below apply to all Users introducing pollutants into a POTW whether or not the source is subject to other National Pretreatment Standards or any national, or local

pretreatment requirement.

40 C.F.R. §403.5(a)(1) states, “*General prohibitions.* A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in [paragraph \(b\)](#) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements.”

COP900709, Part A.3 – Specific Prohibitions

The following pollutants shall not be introduced into a POTW:

...

g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems...

40 C.F.R. §403.5(a)(1) states, “*Specific prohibitions.* In addition, the following pollutants shall not be introduced into a POTW:

...

(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;”

Recommended Action #1:

No recommendations at this time. On February 25, 2025, the facility provided photo documentation to the EPA that this finding was corrected.

Finding #3: The Slug Discharge Control Plan does not match current conditions at the facility

At the time of the inspection, there were several oil drums being stored without secondary containment. The oil drums were observed near a floor drain that connects to Pit 1. Each drum was in active use and equipped with a coffee can and a spill pad to catch drips from the valves (Photo 19).

Permit Requirement:

COP900273, Part F.17 - Slug Control Plan

“The division has determined that a slug control plan is necessary. The permittee shall be required to develop and maintain a slug control plan. The slug control plan should contain at a minimum:

1. General information, including the permittee name and address, contact, discharge practices, security provisions, and employee training.
2. Facility layout flow diagrams, including a map of manufacturing, storage, transportation, and disposal areas.
3. Material inventory, including types, volumes, and containers of materials.
4. Spill and leak prevention equipment and maintenance procedures, including a definition of available equipment and plans to obtain equipment; and procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plan site run-off, worker training, building of containment structures or equipment, and measures for containing toxic organic pollutants (including solvents).
5. Emergency response equipment and procedures, including an inventory and location of equipment and procedures to immediately notify the POTW of any slug discharges and

- procedures for follow-up written notification within 5 days to the division, EPA, and POTW.
6. Slug reporting, including a description of procedures for notifying the division, EPA, and POTW of any slugs.
 7. Training program, including assurances that the slug control plan is implemented by providing for employee training.
 8. Certification, including a certification by a professional that the plan is adequate to prevent and control slugs.

Any updates to the Slug Control Plan shall be submitted to the division and EPA.”

SDCP, Part 5.C.1 – Equipment to Prevent or Detect Spills

“All oil and chemical tanks with slug potential are surrounded by berms which hold more than the volume of the tanks.”

40 C.F.R. §403.8(f)(2)(vi) states, “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under [§ 403.5\(b\)](#) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response;”

Corrective Action #2:

In an email sent from the facility to the EPA on March 27, 2025, the facility stated that Pit 1 is considered secondary containment for the oil drums because it is equipped with an oil skimmer. Outside of a natural disaster, there is no way for water to bypass the oil skimmer or for the influent to flow over the baffle wall. If the oil skimmer were to fail, all untreated water would remain on the left side of the baffle wall until treated. Please update the facility’s SDCP to reflect this process.

INSPECTION REPORT

Inspection Date:	04/11/2022	Announced: Yes		
Time:	Entry: 01:30 PM (MT)	Exit: 03:54 PM (MT)		
Media:	Water			
Statute(s)/Program(s):	Clean Water Act, NPDES, Pretreatment Industrial User			
Type of inspection:	NSCIU – Non-Significant Categorical Industrial User Inspection			
Permittee Name:	Monument Powder Coating, Inc.			
Facility or Site Name:	Monument Powder Coating, Inc.			
Facility/Site Physical Address:	169 South Mulberry Street			
(City, state, zip code)	Fruita, Colorado 81521			
Facility GPS Coordinates:	39.15732 N, -108.73249 W			
Permit Number:	COPF00108			
Inspection Identification Number:	202204_COPF00108			
SIC or NAICS:	332813 Electroplating, Plating, Polishing, Anodizing, and Coloring.			
Persons Participating in Inspection:				
Title	Name	Affiliation	Present at Opening Conf.	Present at Closing Conf.
Lead Inspector	Emilio Llamozas	EPA Region 8	Yes	Yes
Inspector	Kristin Ratajczak	EPA Region 8	Yes	Yes
Inspector	Edward Simas	EPA Region 3	Yes	Yes
Owner	Jesse Mease	Monument Powder Coating, Inc.	Yes	Yes
Lead Inspector:				
Emilio Llamozas			6/1/2022	
	Region 8	Llamozas.Emilio@epa.gov	(303) 312-6407	
Reviewer:				
Kristin Ratajczak			6/2/2022	
	Region 8	Ratajczak.kristin@epa.gov	(303) 312-6310	
Supervisor Review:				
Michael Boeglin	Boeglin, Michael		Digitally signed by Boeglin, Michael Date: 2022.06.03 13:42:40 -06'00'	6/3/2022
	Region 8	boeglin.michael@epa.gov	(303) 312-6250	

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

EPA Region 8 Inspectors, Emilio Llamozas and Kristin Ratajczak, and EPA Region 3 Inspector, Edward Simas, (jointly referred as Inspectors) arrived at the Monument Powder Coating, Inc. (the “site”, “facility” or “Monument Powder Coating”), located at 169 South Mulberry Street, at 01:30 PM (MT) on 04/11/2022 for an announced inspection. The Inspectors presented their credentials to Jesse Mease and informed him that this was an EPA Region 8 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of Section 308 of the CWA. The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Monument Powder Coating, Inc. representatives, observations made by the Inspectors, and records and reports maintained by the permittee and the EPA Region 8 including: photographs taken by the inspectors; verbal or written statements made by Monument Powder Coating, Inc. representatives (the permittee) during, or subsequent to, the on-site inspection; and materials, processes, data, photographs, or documents made available to the inspectors by the permittee during, or subsequent to, the on-site inspection. In addition, information gathered from a review of USEPA, State, and public records may be included in this report.

The facility has been classified by the EPA as a non-significant categorical industrial user (NSCIU) under 40 CFR part 403.3(v)(2). The facility was notified by the EPA of their NSCIU status and the associated requirements in a January 15, 2009 letter. The area where the facility is located is considered an area with potential Environmental Justice (EJ) concerns according to EJ screen because the low income population of 30% is greater than the Colorado state average low income population of 25%.

Facility/Site Description

Monument Powder Coating powder coats various steel and aluminum parts, according to customer specifications. The facility performs work for Monroe Pump, Meyers and Company, Ski Racks, and FHE oil field equipment. The facility is planning to move to a new location at 1596 Cipolla Road, in Fruita, Colorado later this year (photos 14-22 and 108-109). The Inspectors toured both the permitted facility and the new facility during the inspection.

The facility receives the steel and aluminum parts from customers and stages them for the coating process. The steel parts are either sandblasted to a white metal finish or manually hand sanded. Sandblasting operations were performed outdoors at the new facility (photo 11). The spent sand (Green Diamond - zero silica outdoor approved) from the sandblasting is dumped in the dumpster and sent to the landfill.

The steel parts are prepared for powder coating by using the phosphate etch process. The facility receives iron phosphate chemicals (Bulk Bond 739SC) in 5-gallon containers; however, due to shortages the last shipment was a 55-gallon container. The iron phosphate chemicals are then transferred to smaller containers and stored indoors in secondary containment (photo 4). The facility mixes approximately eight ounces of iron phosphate in a two-gallon pump sprayer to apply to the steel parts (photos 12 and 20). The pump sprayer is used for precise application, to control chemical use, and to minimize overspray. Prior to iron phosphate application, the facility uses a pressure washer to rinse the part. Following the initial rinse, the facility applies iron phosphate, and completes a final rinse with the pressure washer. There is an inline flow meter to measure the water that is used in the rinsing processes (photos 10-11). The flow meter displays the volume in liters. Mr. Mease performs a calculation to change the volume to gallons. The facility uses less than five gallons of the phosphate chemical per week and an average of 60 gallons of rinse water per day. The rinses and iron phosphate application are

performed in the wash bay (photo 7). A large floor drain is located in the center of the wash bay, that leads to a two chamber sand interceptor (photo 13) located outside of the front door of the facility. The facility performs weekly pH samples at the second chamber of the sand interceptor.

The aluminum parts are sanded and sprayed with an aluminum deoxidizing chemical, called CED. The facility mixes approximately 32 ounces of the CED chemical with water in a gallon pump sprayer to apply onto the aluminum parts (photos 12 and 20). The facility sprays a second CED application to the parts, if needed. The aluminum parts are then rinsed in the wash bay (photo 7). An average of 5 gallons of CED are used per week. The CED is stored in a 55-gallon container.

The phosphated steel parts and deoxidized aluminum parts are prebaked in the oven (photo 9), then powder coated in a paint booth (photo 8). The facility uses multiple colors and sweeps up the excess powder paint and disposes the paint in the dumpster. Due to the nature of the powder, no water or chemicals are used between colors; rather, lines are cleared with air pressure. The powder coated parts are cured in the oven (photo 9). Any off-specification powder coated parts are hand sanded and repainted. No water is used in the powder coat area.

Facility/Site Information

Type and overview of Operation(s)	Metal Finishing Operations.
Number of employees	4 employees.
Shifts/Hours of operations	One shift - Monday through Friday, 8 am to 5 pm.
How is the IU categorized?	Non-Significant Categorical Industrial User.
Date of start-up (beginning of construction?)	2004, new source to the Metal Finishing Point Source Category.
What is the principal product generated?	Powder coating of various steel and aluminum parts, according to customer specifications.
What are the raw materials used?	Steel and aluminum parts from different customers, Bulk Bond 739SC, CED and different powder coatings.
Has any production process changed since the last time you were permitted by the Control Authority?	The facility has been processing more aluminum products in the last year. The facility is also using less amounts of the zinc phosphate coating.
Name/Type/Location of the receiving Wastewater Treatment Plant and WWTP Permit #	Fruita Wastewater Treatment Reclamation Facility CO-0048854, which discharges to the Colorado River.

SECTION II – OBSERVATIONS

Following the opening conference, Mr. Mease accompanied the group of Inspectors on a facility walkthrough, with focus placed on the metal finishing process, chemical storage areas, and the sampling point for the permitted facility. The Inspectors also inspected the new facility. To document and record conversation and inspection observations, the inspectors took notes using the Smart Tools Software and bound checklists with questions applicable to the facility. Photographs taken during the inspection are included in the attached photo log. Inspectors took photos of the same areas of the facility with a camera and with the Smart Tools Software via a tablet. Only the photos taken with the camera are included in the attached photo log. The photos taken with the Smart Tools Software via the tablet are available upon request.

SECTION III – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted during the inspection.

SECTION IV – FINDINGS, CORRECTIVE ACTIONS AND RECOMMENDATIONS

Location:	Area:	Sub-area:
EL1-OB-001	New Facility	
<u>Finding 1. Monument Powder Coating had not notified the EPA or the City of Fruita in writing about its plans to move the metal finishing operations to a new facility.</u> Monument Powder Coating built a new facility located at 1596 Cipolla Road, Fruita, Colorado. Some of the metal finishing process operations have moved to the new facility including sand blasting, application of metal finishing chemicals, and associated rinses (photos 14-22 and 108-109). Monument Powder Coating is expecting to be fully operational at the new facility later this year. Monument Powder Coating must notify the EPA and the City of Fruita about the change in location as a change in discharge according to Part III.B of the permit and 40 CFR 403.12(j). <u>Pretreatment Requirements</u> According to 40 C.F.R. §403.12(j), “All Industrial Users shall promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under paragraph (p) of this section.” According to Part III.B of the Non-Significant Categorical Industrial User Requirements, “This regulation requires the facility to promptly notify EPA and the City of Fruita in advance of any substantial change in the volume or character of pollutants in its discharge. These substantial changes include changes that may affect the NSCIU requirements contained in this notification and could include changes to the operations, wastestream generation, and/or wastewater management (discharges of volumes above 100 gallons per day for any day or discharges of concentrated chemical solutions) that may affect the status of the facility under the Pretreatment Regulations. This also includes any changes to the operation that changes the discharge of listed or hazardous wastes.” <u>Corrective Action</u> Promptly notify the EPA and the City of Fruita in writing in advance of the change in location as a change in discharge according to Part III.B of the permit and 40 CFR 403.12(j). Indicate if the new facility will discharge over 100 gallons per day of wastewater for any day of operation. Provide the EPA with a description of the corrective actions taken to address this finding.		
EL1-OB-002	Current facility and new facility	
<u>Finding 2. Some chemicals at both facilities were stored in close proximity to the sewer drain without secondary containment.</u> There were some chemicals in the current facility (photos 5-6 and 12) and in the new facility (photos 20-22) that were in close proximity to the sewer drain without secondary containment. There is a potential for slug discharges to the POTW if there is a spill of these chemicals. On April 29, 2022, Mr. Mease sent an email to the EPA indicating that he had asked his chemical representative if they would take back the extra containers of miscellaneous chemicals that were not being used. However, he did not indicate if the chemical representative took back the chemicals.		

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), "If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response."

Recommendation

Either move the storage of these supply chemicals further away from the phosphate spray wash bay area or ensure these chemicals are stored in appropriate secondary spill containment. Provide the EPA with a description of the corrective actions taken to address this finding.

EL1-OC-NT		
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Finding 3. The buffers used to calibrate the pH meter were expired.

Mr. Mease was calibrating the pH meter once a quarter. Mr. Mease indicated that he bought new pH buffers, but the pH buffers received from the vendor were expired. The pH 4 buffer had expired in May 2018 and the pH 10 buffer had expired in November 2018. Monument Powder Coating indicated during the inspections that they purchased new buffers and were expecting to receive them in the near future.

Pretreatment Requirements

According to Part III.A.4 of the Non-Significant Categorical Industrial User Requirements, "If the facility monitors any regulated pollutant listed in Part II.A.1 of these NSCIU Requirements at Outfall 001 more frequently than required using representative sampling and analytical procedures listed in 40 CFR 136, the results of this monitoring shall be included in the Annual NSCIU Compliance Report."

40 C.F.R. §136.3(a) lists the approve methods for hydrogen ion (pH). These methods require the calibration of the pH meter with unexpired buffers.

Corrective Action

On May 9, 2022, Mr. Mease sent an email to the EPA with photos of the new pH buffer solutions (4.01 and 10.00). Provide the EPA with the expiration dates for the pH buffer solutions (4.01 and 10.00).

EL1-RR-001		
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Finding 4. The Annual NSCIU Compliance Report due on January 31, 2022 was missing the NSCIU statement of certification.

The Monument Powder Coating Annual NSCIU Compliance Report due on January 31, 2022 was missing the NSCIU statement of certification required by Part III.A.2 of the permit and 40 CFR 403.12(q).

Pretreatment Requirements

According to Part III.A. of the Non-Significant Categorical Industrial User Requirements, "The Annual NSCIU Compliance Report shall include the certification statement required by 40 CFR § 403.12(q) and included in Part III.D of these NSCIU Requirements. The certification statement shall be signed by the appropriate signatory official as stated in Part III.D of these NSCIU Requirements."

According to the requirements at 40 C.F.R. §403.12(q), "A facility determined to be a Non-Significant Categorical Industrial User pursuant to § 403.3(v)(2) must annually submit the following certification statement, signed in accordance with the signatory requirements in paragraph (l) of this section. This certification must accompany any alternative report required by the Control Authority:

Based on my inquiry of the person or persons directly responsible for managing compliance with the categorical Pretreatment Standards under 40 CFR ____, I certify that, to the best of my knowledge and belief that during the period from _____, to _____, ____ [month, days, year]:

(a) The facility described as _____ [facility name] met the definition of a non-significant categorical Industrial User as described in § 403.3(v)(2); (b) the facility complied with all applicable Pretreatment Standards and requirements during this reporting period; and (c) the facility never discharged more than 100 gallons of total categorical wastewater on any given day during this reporting period. This compliance certification is based upon the following information: _____"

Corrective Action

On May 19, 2022, Mr. Mease sent an email to the EPA with the NSCIU statement of certification for the year 2021. The NSCIU statement of certification was signed on May 18, 2022. No further action is required based on the May 19, 2022, response. Ensure that future Annual NSCIU Compliance Reports include the NSCIU statement of certification.

Finding 5. The 2021 Annual NSCIU Compliance report was late.

The 2021 Monument Powder Coating Annual NSCIU Compliance Report was submitted on February 16, 2022. Part III.A.1 of the permit requires that the Annual NSCIU Compliance Report be submitted by January 31 of each year.

Pretreatment Requirements

According to Part III.A. of the Non-Significant Categorical Industrial User Requirements, "The Annual NSCIU Compliance Report is due by the date listed below and shall not be submitted until the compliance monitoring period is complete. The report shall contain information from the associated compliance monitoring period."

Compliance Monitoring Period	Due Date
January through December	January 31

Corrective Action

Ensure that the Annual NSCIU Compliance Report is submitted by January 31 of each year. Provide the EPA with a description of the corrective actions taken to address this finding.

EL1-RR-002

Finding 6. The pH of the wastewater discharged was less than 5 from January 17, 2022 to April 11, 2022.

Part II.A.1 of the permit requires the pH of the facility's effluent to be greater than or equal to 5. The pH of the wastewater discharged from the facility was below 5 for measurements taken from January 17, 2022 to April 11, 2022. Monument Powder Coating attributed the lower pH readings in the wastewater to the increase in production of aluminum parts that are sprayed coated with CED. The pH exceedances are listed below:

Jan 2022	Feb 2022	March 2022	April 2022
1/17 - pH 4.6	2/1 - pH 4.1	3/1 - pH 3.8	4/4 - pH 3.4
1/24 - pH 4.6	2/7 - pH 3.9	3/7 - pH 3.6	4/11 - pH 3.1
1/31 - pH 4.1	2/14 - pH 4.1	3/14 - pH 3.7	
	2/21 - pH 3.8	3/21 - pH 3.1	
	2/28 - pH 3.8	3/28 - pH 3.4	

For the pH violations listed above, Monument Powder Coating did not notify the EPA within 24 hours of becoming aware of the violation as required by 40 CFR 403.12(g)(2).

On April 29, 2022, Mr. Mease indicated that the facility stopped using the CED chemical on the aluminum parts until they could come up with a more consistent way of controlling the pH. Mr. Mease indicated that the facility switched back to the previous chemical that was used to clean the aluminum parts.

On May 19, 2022, Mr. Mease provide the wastewater pH measurements taken after the inspection. The results are listed below:

- April 18, 2022 – 7.4
- April 25, 2022 – 8.0
- May 2, 2022 – 8.1
- May 9, 2022 – 8.0
- May 16, 2022 – 8.2

EPA reviewed the last 6 months of pH data (November 16, 2021 to May 16, 2022) and found that 15 of 27 samples exceeded the pH limit for an exceedance rate of 55.5%.

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.5(b)(2), "In addition, the following pollutants shall not be introduced into a POTW:... Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;"

According to Part II.A.1 of the Non-Significant Categorical Industrial User Requirements, "Monument Powder Coating is still subject to the Metal Finishing Regulations and the limits in Table 1 are applicable should the facility no longer be classified as an NSCIU." Table 1 has a limit that indicates that the pH of the wastewater discharges must be greater than or equal to 5.

According to the requirements at 40 C.F.R. §403.12(g)(2), "If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation."

Corrective Action

Ensure that the effluent limit for pH of greater than or equal to 5 is met. Ensure the EPA is notified within 24 hours of becoming aware of violations, including pH violations. Provide the EPA with a description of the corrective actions taken to address this finding.

EL1-RR-003		
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Finding 7. The facility failed to document specific pH monitoring information.

For the weekly pH measurements at the outfall, Monument Powder Coating was recording the date and the results of the pH measurement. The facility had not recorded the exact place, collection method, time of sampling, the name of the person taking the samples and the analytical method used for the pH measurements as required by Part II.B of the permit and 40 CFR 403.12(o)(1).

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.12(o), "Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples:

- (i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
- (ii) The dates analyses were performed;
- (iii) Who performed the analyses;
- (iv) The analytical techniques/methods use; and
- (v) The results of such analyses.”

According to Part II.B of the Non-Significant Categorical Industrial User Requirements, “The facility shall maintain records of all information resulting from any monitoring activities required by the Pretreatment Regulations, including documentation associated with Best Management Practices (BMPs) (e.g., inspections of spill control BMPs) for a minimum of three years. Refer to Part IV.A of this enclosure for additional information about Retention of Records. Such records shall include for all samples:

1. The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
2. The dates and times analyses were performed;
3. Names of individual(s) who performed the analyses;
4. The analytical techniques/methods used; and
5. The results of such analyses.”

Corrective Action

Ensure that all required pH monitoring documentation including the exact place, collection method, time of sampling, the name of the person taking the samples and the analytical method used for the pH measurements as required by Part II.B of the permit and 40 CFR 403.12(o)(1). Provide the EPA with a description of the corrective actions taken to address this finding.

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The Inspectors held a closing conference with Mr. Mease at 03:54 PM (MT) on 04/11/2022 for the inspection. During the closing conference, Inspectors discussed the observations and preliminary findings identified during the inspection. On April 21, 2022, the EPA sent an email to Mr. Mease with the preliminary findings from the inspection. Mr. Mease sent emails to the EPA on April 29, 2022, May 9, 2022, and May 19, 2022, with a summary of the corrective actions implemented at the facility. These actions are described in the findings above.