

REPORT OF INDUSTRIAL USER COMPLIANCE EVALUATION INSPECTION

AT

**Kice Industries, Inc.
5500 N. Mill Heights Drive
Park City, KS 67219**

KANSAS PRETREATMENT PERMIT: KSP000101

BY

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

**Enforcement and Compliance Assurance Division
February 28, 2024**

INTRODUCTION

I conducted an Industrial User Compliance Inspection at Kice Industries in Park City, Kansas, on February 28, 2024. The inspection was conducted under the authority of Section 308 of the Clean Water Act (as amended) and in accordance with EPA Region 7 Standard Operating Procedures. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Kice Industries Inc. Company:
Brian Hybsha, Facility Manager
Email: bhybsha@kice.com

ISI Environmental (consultant to Kice Industries):
Bria Weast, Field Services Manager
Email: bweast@isienvironmental.com
Rachel Sample, Project Manager
Email: rsample@isienvironmental.com

U.S. Environmental Protection Agency (EPA), Region 7:
Joe Heafner, Life Scientist
Email: heafner.joseph@epa.gov

FACILITY DESCRIPTION

The Kice Industries Inc. manufacturing facility in Park City manufactures pneumatic air handling and filtering systems for a variety of clients from steel, stainless steel, and aluminum sheet metal. The

facility consists of five conjoined work areas. Manufacturing processes include cutting, welding, machining, milling, and parts cleaning prior to wet painting. The facility has approximately 242 employees and operates two shifts, five days per week and one shift 3 days per week, primarily on the weekends.

Parts are cleaned in a wash booth using a hand-sprayer (Photo 4) which sprays a diluted phosphoric acid solution. I received a Safety Data Sheet for the phosphoric acid solution after the conclusion of the inspection and placed it in the ECAD electronic file for the facility. Wastewater from the parts washing flows to a collection sump (Photo 5). The collection sump discharges to a 300-gallon filtration system (Photo 2) which filters the water then recirculates the wastewater for reuse. The wastewater in the filtration system is periodically (once, every six to eight weeks) pumped out of the system, stored in one of two 300-gallon wastewater storage tote (Photo 1), neutralized if necessary, and then conveyed by forklift to and discharged to the City's collection system at the hand washing station in Plant 5 (Photo 3). This discharge point is used because there is no floor drain or other access point to the collection system.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced on the morning of February 28, 2024, introduced myself, presented my credentials to Mr. Hybsha, and I explained the purpose and procedures of the inspection. I conducted the physical inspection of the facility that morning with Mr. Hybsha, Ms. Weast, and Ms. Sample, focusing on inspecting the wastewater generation and disposal processes. I completed the inspection by filling in an Industrial User Inspection Checklist which is included as attachment 2. I conducted an exit briefing with Mr. Hybsha, Ms. Weast, and Ms. Sample at the conclusion of the physical inspection and exited the facility that morning.

SAMPLING PROCEDURES:

During the inspection, the collection totes were observed to be empty. Since the collection totes were empty at the time of the inspection and no discharge of process wastewater was occurring during the inspection, no samples of process wastewater from the facility were collected.

FINDINGS AND OBSERVATIONS

1. Permit: A Kansas Pretreatment Permit was issued to Kice Industries Inc. on January 1, 2024 and will expire on December 31, 2028 (attachment 3). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, silver, and zinc), cyanide, and total toxic organics (TTOs). The permit also places numerical limitations on those parameters. The permit further requires the facility to sample and analyze the parameters on a

quarterly basis and submit discharge monitoring reports (DMRs) to KDHE on a semi-annual basis (January 28 and July 28 of each year).

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last four reporting periods which were provided by the facility after the completion of the inspection. I found that the facility was in compliance for each of those periods. In addition, I obtained a copy of the facility's monitoring data for the 1st quarter of 2024. After I reviewed the documents provided, I placed the documents within the ECAD electronic file for the facility. I reviewed all of the semi-annual reports and noted that there were no effluent limit violations during any of the reporting periods reviewed.

3. Water Balance: Water balance for the regulated process at the Kice facility could not be achieved because flow to the wash booth is not measured and the water meter that feeds the facility also supplies water to a small orchard outside the facility. This orchard is watered heavily in the summer. In addition, the effluent flow data reported on the DMRs is estimated for each discharge by observing the volume within the wastewater storage tote. This method of flow estimation appears to be a reasonable method for determining the flow to the sanitary sewer system.

To verify this, I was provided copies of the facility's City water bills for the past 6 months (September 2023 – February 2024). I examined the water bills, especially the ones for meter #0400 (which feeds plant 4). I found that the water use significantly varied month to month with some winter months showing almost no water used and some months over 140,000 gallons were used.

4. Solvent Management Plan (SMP): I received a copy of the facility's SMP which is included as attachment 4. I examined the plan and found it had been updated and sent to KDHE in December 2023.

JOSEPH
HEAFNER

Joe Heafner
Life Scientist

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Branch Chief

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Attachments:

1. Facility Photos (6 pages)
2. EPA Industrial User Inspection Checklist (6 pages)
3. Pretreatment Permit (15 pages)
4. Solvent Management Plan (5 pages)