



REGION 5

CHICAGO, IL 60604

Marshall K. Schrader, Superintendent
Galesburg Sanitary District
2700 West Main Street
Galesburg, Illinois 61401

Subject: December 3 – 5, 2024 Pretreatment Compliance Inspection Report for the Galesburg Sanitary District

Dear Mr. Schrader:

Please find enclosed a copy of the Inspection Report generated as a result of the pretreatment compliance inspection of the Galesburg Sanitary District, conducted by the U.S. Environmental Protection Agency from December 3 – 5, 2024. The purpose of the inspection was to conduct a review of the City's pretreatment program implementation. During the inspection, EPA observed several areas of concern; these are listed in the enclosed report. Please provide a written response to the areas of concern identified in the report within 30 days. In your response, please include a description of actions taken to correct any issues documented in the inspection report. Your response should be submitted electronically to dooling.valerie@epa.gov and r5pretreatment@epa.gov. Where it is infeasible to submit electronically, you may mail the information to:

Val Dooling, Water Division, EPA Region 5
77 W. Jackson Blvd. (WC-15J)
Chicago, Illinois 60604-3590

If you have any questions or concerns regarding this letter, or the inspection report, please contact Val Dooling at 312-886-7167 or at dooling.valerie@epa.gov.

Sincerely,

Ryan Bahr

Digitally signed by Ryan
Bahr
Date: 2025.02.11
13:21:43 -06'00'

Ryan J. Bahr, Chief
Section 2
Water Enforcement and Compliance Assurance Branch

**U.S. EPA Pretreatment Compliance Inspection:
Galesburg, Illinois NPDES IL0023141
December 3-5, 2024**

Control Authority Name and Address

Galesburg Sanitary District
2700 West Main Street
Galesburg, IL 61401

Responsible Official

Marshall K. Schrader, Superintendent
Brandi H. Young, Plant Superintendent

Inspection Participants

Marshall K. Schrader, Superintendent
Brandi H. Young, Plant Superintendent
Val Dooling, Lead Inspector
Eric Small, Assistant Inspector

Inspector Signature and Date: VALERIE DOOLING Digitally signed by VALERIE DOOLING
Date: 2025.02.11 09:24:12 -06'00'

Inspector:

Val Dooling, Environmental Engineer
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date Ryan Bahr Digitally signed by Ryan Bahr
Date: 2025.02.11 13:20:17 -06'00'

Approver Name & Title:

Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

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SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency conducted a Federal Pretreatment Compliance Inspection (PCI) of Galesburg Sanitary District (GBSD) from December 3-5, 2024. The purpose of the inspection was to evaluate the procedures and implementation of GBSD's pretreatment program. Special Condition 21 of GBSD's National Pollutant Discharge Elimination System (NPDES) Permit IL0023141 require GBSD to operate its approved pretreatment program. The pretreatment program was approved on July 3, 1985.

EPA's inspection consisted of:

1. Review of requested submittals prior to on-site inspection;
2. Interviews and discussion with GBSD staff;
3. Industrial User (IU) file reviews; and
4. Site visits at IUs.

On December 3, 2024, EPA Inspectors, Val Dooling and Eric Small arrived at the GBSD office in Galesburg, Illinois. We met Mr. Marshall Schrader, Superintendent; Ms. Brandi Young, Plant Superintendent; and Mr. Eric Oliphant, Plant Chemist. Inspector Small and I presented our credentials and began the inspection. I asked whether any information was considered Confidential Business Information (CBI). Mr. Schrader responded that some of the IU files contained CBI; however, per the scope of the inspection it was deemed not necessary for us to review any CBI.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

Mr. Schrader told me that the GBSD Sewage Treatment Plant (STP) was originally built in the 1930s, with modifications in the 1940s. Treatment capacity was increased in the 1970s with construction of a second plant however both plants are currently operational. The entire STP has design average flow of 11 million gallons per day (MGD) and maximum flow of 28 MGD with excess flow stored in two basins. Industrial wastewater is estimated to be 0.12 MGD.

Treatment consists of bar screens, grit removal, primary clarifiers, trickling filters, final clarifiers, tertiary drum filters and disinfection through ultraviolet treatment. A new Sewage Treatment Plant which will replace the existing STP is expected to be operational by 2028. It is being completed in three phases. At the time of the inspection, Phase I and half of Phase II had been completed.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

GBSD provided the following information about its pretreatment program to EPA prior to the PCI.

A. Pretreatment Program Modification:

GBSD received its latest NPDES Permit effective September 1, 2020 and expires August 31, 2025.

B. Legal Authority:

GBSD serves the Cities of Galesburg and the satellite East Galesburg. An intergovernmental agreement provides legal authority to address the contributing jurisdiction however, no SIUs are located in the

contributing jurisdiction. The authority to implement and enforce pretreatment standards and requirements are located in the sewer use ordinance, Galesburg Sanitary District Ordinance 450, which was last revised in 2017.

C. IU Characterization:

Most SIUs are legacy organization and GBSD uses review of water billing records, building permits, onsite inspections, newspaper and permit applications to update the industrial waste survey and identify changes to the industrial wastewater discharges to its STP.

GBSD's definition of significant industrial user (SIU) is consistent with the language in the Federal regulations at 40 CFR 403.3(t)(1). The STP accepts piped waste from four regulated Industrial Users (IUs), of those, two are categorical industrial users (CIUs), one is noncategorical significant IU (SIU) and one is a regulated noncategorical IU. GBSD STP accepts hauled wastewater with prior approval. Haulers are from local septage haulers and Knox County Landfill and hauled waste is regulated through the sewer use ordinance.

D. Control Mechanism Evaluation:

The individual permits SIUs have a maximum term of 5 years and include:

- Statement of duration
- Statement of non-transferability
- Effluent limits
- Self-monitoring requirements
- Statement of applicable civil and criminal penalties

E. Application of Pretreatment Standards and Requirements

GBSD has technically evaluated the following pollutants:

- Arsenic
- Barium
- Cadmium
- Chromium
- Copper
- Cyanide
- Fluoride
- Iron
- Lead
- Manganese
- Mercury
- Nickel
- Fats Oil and Grease
- pH
- Phenols

- Selenium
- Silver
- Total Toxic Organics
- Zinc

F. Compliance Monitoring:

GBSD performs compliance monitoring according to its pretreatment requirements with inspection once per year and sampling at least twice per year at each industrial user. Inspections includes records review interview and walkthrough.

G. Enforcement:

GBSD's definition of significant non-compliance is consistent with EPA's definition.

The compliance options that are available to GBSD in the event of industrial user noncompliance are:

- Verbal or written notice
- Administrative order
- Notice of violation
- Civil penalty
- Judicial proceedings
- Termination of discharge

H. Data Management/Public Participation:

GBSD maintains all pretreatment files electronically in password protected location for minimum of three years. Public notification is through the local newspaper and on GBSD's website.

I. Resources:

GBSD allocates 0.25 full time equivalent to its pretreatment program.

SECTION 4.0: INDUSTRIAL USER FILE REVIEWS

4.1 IU Identification

IU Permit Number	IU Name	IU Type	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
2022-09-29	Koppers Industries, Inc	CIU	45,000	Yes	Valerie Dooling	40 CFR #429 Timber Products Processing
2017-6-30	The Burlington Northern	Non-Categorical SIU	12,538	Yes	Eric Small	

	Santa Fe Railroad					
2023-04-30	The Gates Rubber Company	CIU	23,000	No	Valerie Dooling	40 CFR #428 Rubber Manufacturing

4.2 Facility Information

Koppers Industries, Inc
1291 State Route 41
Galesburg, Illinois 61401

Facility started operation in 1908 with two wood treating pressure cylinders for creosote. In 2004, a third cylinder was added and in 2012 a borate process was added. The products produced are cross ties and switch ties. Facility also holds NPDES Permit IL0035688 for stormwater discharge through a separate outfall.

The facility produces 7.9 million cubic feet per year. It is categorized under 40 CFR 429.95 pretreatment standards for existing sources, since borate process is a modification of the existing process. The facility uses the Boulton process for conditioning wood where the cylinder is charged with wood and a heated preservative is used to heat the wood charge for up to 24 hours. At that point a vacuum is drawn, and the preservative is returned to the work tank.

The facility discharges up to 8 hours per day on weekdays during operation. The processes that result in discharge are: cleanup wash waters, boiler blow down, wood preserving (primarily Boulton process) and storm water collected in containment areas.

Creosote and borate are used in wood treating process. The pretreatment system is designed to address oil and grease and organics that may be contained in collected wastewater as a result of any contact with creosote. Boiler cleaning chemicals, cleaners from the drop pad and other containment and borate residual from treating process may also be present in the wastewater in low quantities. Sludge from pretreatment system is discharged as hazardous waste and shipped out by a waste contractor, if it is not usable in on site treatment or at another Koppers chemical production facility.

The Burlington Northern Santa Fe (BNSF) Railroad
2215 South Henderson Street
Galesburg, Illinois 61401

BNSF operates a locomotive and rail car maintenance facility on the south side of Galesburg. Process

wastewater from BNSF consists of residuals from locomotive fueling and maintenance, rinsing of equipment and floors, and precipitation runoff in industrial drainage areas. The discharge is seasonally dependent. During dry weather flows, discharge is every few days for a few hours; during wet weather events, discharge can increase up to 15 hours a day. The maximum flow rate is 300 gallons per minute (GPM), with the facility's average as 300 GPM. The facility operation is 24 hours a day and 7 days a week.

The Gates Rubber Company
630 U.S. Highway 150 East
Galesburg, Illinois 61401

Facility is classified as 40 CFR 428 Large sized general molded, extruded and fabricated rubber plants subcategory, existing source. The facility started operation in 1961. Mixers 3 and 4 were added in 1996 and 1998. Lead was eliminated by 2003. No federal pretreatment effluent standards exist for this subcategory. Discharge of industrial wastewater is continuous over 7 days per week and 24 hours per day. Mass limits in the permit is converted to concentration based on 2023 annual average flow of 25,000 gallons per day.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

All four IUs were issued or reissued an individual control mechanism with a statement of duration for a maximum of five years. The control authority has not issued any general control mechanisms.

Individual control mechanism contents

Statement of Non-transferability

- For this category, no issues of concern were identified during the inspection.

Applicable effluent limits (local limits, categorical standards, Best Management Practices)

- For this category, no issues of concern were identified during the inspection.

Self-monitoring requirements

Reporting requirements (including all monitoring results)

- The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company requires the IU to report all samples on semi-annual basis do not include the requirement according to 403.12(g)(6) that if an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, the results of this monitoring shall be included in the report.

Record-keeping requirements

- For this category, no issues of concern were identified during the inspection.

Notification requirements

Notice of slug loading

- For this category, no issues of concern were identified during the inspection.

Notification of spills, bypasses, upsets, etc.

- The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company Koppers Industries, Inc include conditions that if the facility experiences an upset it must notify GBSD but there is an no explicit prohibition of bypass or notification in the event of bypass.

Notification of significant change in discharge

- For this category, no issues of concern were identified during the inspection.

24-hour notification of violation/resample requirement

- The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company Koppers Industries, Inc Koppers Industries, Inc include a notification to notify GBSD within 24 hours of a sample result that has a permit exceedance, but there is not the provision to resample within 30 days according to 403.12(g)(2).

Statement of applicable civil and criminal penalties

- For this category, no issues of concern were identified during the inspection.

Compliance Schedules

- For this category, no issues of concern were identified during the inspection.

Requirements to control slug discharges; determined by the POTW to be necessary

- For this category, no issues of concern were identified during the inspection.

Issuance of General Control Mechanisms

Not applicable for any IUs

B. Application of IU Pretreatment Standards:

IU Categorization

Calculation and application of categorical standards

- For this category, no issues of concern were identified during the inspection.

Classification by category/subcategory

- For this category, no issues of concern were identified during the inspection.

Classification as new/existing source

- For this category, no issues of concern were identified during the inspection.

Application of limits for all regulated pollutants

- For this category, no issues of concern were identified during the inspection.

Classification of nonsignificant CIU

- For this category, no issues of concern were identified during the inspection.

Application of local limits

- For this category, no issues of concern were identified during the inspection.

Application of Best Management Practices

- For this category, no issues of concern were identified during the inspection.

Calculation and application of production-based standards

- For this category, no issues of concern were identified during the inspection.

Calculation and application of CWF or FWA

- For this category, no issues of concern were identified during the inspection.

Application of most stringent limit

- For this category, no issues of concern were identified during the inspection.

C. CA Compliance Monitoring

Sampling (once a year, except as otherwise specified)

- GBSD has not been sampling for all of Burlington Northern Santa Fe Railroad's local limits during the three-year period reviewed. Local limits not sampled for include total cyanide, cadmium, selenium, TTO, arsenic, chromium, copper, lead, nickel, and zinc. Local limits should be sampled by GBSD once per year.

If a POTW has waived monitoring for CIU: Sample waived pollutant(s) at least once during the term of the control mechanism

- For this category, no issues of concern were identified during the inspection.

If a POTW has reduced an IU's reporting requirements: Sample and analyze IU discharge at least once every 2 years

- For this category, no issues of concern were identified during the inspection.

Sampling at frequency specified in approved program

- GBSD has not been sampling for all of Burlington Northern Santa Fe Railroad's local limits during the three-year period reviewed. Local limits not sampled for include total cyanide, cadmium, selenium, TTO, arsenic, chromium, copper, lead, nickel, and zinc. Local limits should be sampled by GBSD once per year.

Documentation of sampling activities

- For this category, no issues of concern were identified during the inspection.

Analysis for all regulated parameters

- GBSD has not been sampling for all of Burlington Northern Santa Fe Railroad's local limits during the three-year period reviewed. Local limits not sampled for include total cyanide, cadmium, selenium, TTO, arsenic, chromium, copper, lead, nickel, and zinc. Local limits should be sampled by GBSD once per year.

Appropriate sampling techniques and analytical methods (40 CFR Part 136)

- For this category, no issues of concern were identified during the inspection.

Inspection (once a year, except as otherwise specified)

- For this category, no issues of concern were identified during the inspection.

If a POTW has determined a discharger to be a NSCIU: Evaluation of discharger with the definition of NSCIU once per year

- For this category, no issues of concern were identified during the inspection.

If a POTW has reduced an IU's reporting requirements: Inspect at least once every 2 years

- For this category, no issues of concern were identified during the inspection.

Inspection at frequency specified in approved program

- For this category, no issues of concern were identified during the inspection.

Documentation of inspection activities

- For this category, no issues of concern were identified during the inspection.

Evaluation of need for slug discharge control plan

- For this category, no issues of concern were identified during the inspection.

D. CA Enforcement Activities

Identification of discharge violations

- For this category, no issues of concern were identified during the inspection.

Identification of monitoring/reporting violations

- For this category, no issues of concern were identified during the inspection.

Identification of compliance schedule violations

- For this category, no issues of concern were identified during the inspection.

Calculation of SNC

- For this category, no issues of concern were identified during the inspection.

Publication of SNC

- For this category, no issues of concern were identified during the inspection.

Adherence to approved ERP

- For this category, no issues of concern were identified during the inspection.

Escalation of enforcement

- For this category, no issues of concern were identified during the inspection.

E. IU Compliance Status

Sampling by IU at frequency specified in control mechanism/regulations

- For this category, no issues of concern were identified during the inspection.

Analysis by IU of all required pollutants in accordance with appropriate sampling techniques and analytical methods

- pH holding time on Burlington Northern Santa Fe Railroad reports is not within the 15-minute holding time interval.

Submission by IU of BMR/90-day report

- For this category, no issues of concern were identified during the inspection.

Periodic self-monitoring reports submitted by IU

- For this category, no issues of concern were identified during the inspection.

Reporting by IU on all required pollutants

- For this category, no issues of concern were identified during the inspection.

IU signatory/certification of reports

- Koppers Industries, Inc's periodic reports on continued compliance under 40 CFR 403.12(e) do not include the certification under 403.6(a)(2)(ii) and either a wet ink or CROMERR compliant signature.

Annual certification by NSCIUs

- For this category, no issues of concern were identified during the inspection.

Submission by IU of compliance schedule reports by required dates

- For this category, no issues of concern were identified during the inspection.

IU notification within 24-hours of becoming aware of discharge violations including slug loading or accidental spill

- For this category, no issues of concern were identified during the inspection.

Resampling/reporting by IU within 30 days of knowledge of violation

- For this category, no issues of concern were identified during the inspection.

Notification by IU of hazardous waste discharge

- For this category, no issues of concern were identified during the inspection.

IU submission/implementation of slug discharge control plan

- For this category, no issues of concern were identified during the inspection.

Slug discharge control plan contains procedures for immediately notifying the POTW of slug discharges

- Slug discharge control plans for Koppers Industries, Inc and The Gates Rubber Company do not contain procedures or numbers for notifying the POTW in the event of a spill.

Notification by IU of significant changes in discharge

- For this category, no issues of concern were identified during the inspection.

Noncompliance with reporting requirements (but not SNC)

- For this category, no issues of concern were identified during the inspection.

Noncompliance with discharge limits (but not SNC)

- For this category, no issues of concern were identified during the inspection.

Significant Noncompliance

SNC for chronic violations

- For this category, no issues of concern were identified during the inspection.

SNC for TRC

- For this category, no issues of concern were identified during the inspection.

SNC for pass through or interference

- For this category, no issues of concern were identified during the inspection.

SNC for any discharge causing imminent endangerment to human health, welfare or to the environment

- For this category, no issues of concern were identified during the inspection.

SNC for failure to meet, within 90 days after the schedule date, a compliance schedule construction milestone contained in a local control mechanism or enforcement order

- For this category, no issues of concern were identified during the inspection.

SNC for failure to provide, within 45 days after the due date, required reports

- For this category, no issues of concern were identified during the inspection.

SNC for failure to accurately report noncompliance

- For this category, no issues of concern were identified during the inspection.

SNC for other violations

- For this category, no issues of concern were identified during the inspection.

SECTION 5.0: INDUSTRIAL USER SITE VISITS

Koppers Industries, Inc

Val Dooling and Eric Small (EPA Representatives) met with Marshall Schrader, Brandi Young, and Eric Oliphant (GBSD Representatives) at Koppers at 9:00 am on December 5, 2024, and met with Koppers representatives: Jim Evans, Plant Manager; Drew Lozier, Assistant Plant Manager; David Buchanan, Environmental Manager. EPA Representatives showed their inspector credentials to Koppers Representatives, and I asked whether any information that would be discussed was considered Confidential Business Information (CBI). Mr. Evans replied that there was not. I explained the purpose and scope of the inspection then we began a discussion of the facility and Ms. Young went through GBSD's inspection reporting sheet (Appendix B).

Mr. Evans explained the creosote preservation process and product lifecycle and how borate process differs. He told me the facility has been in operation since 1950s and that it will treat wastewater 24 hours per day and 7 days per week in three shifts, but the facility runs two processing shifts. He explained that the only discharge to the sewer is process wastewater, and the facility treats domestic wastewater via onsite septic.

Mr. Buchanan explained the treatment system that wastewater from water in wood and creosote settles and creosote sinks. Sludge is reclaimed or discharged as K001 hazardous waste. An API, or oil water separator settles out solids and removes petroleum and aeration system breaks down dissolved organics. After aeration the wastewater is discharged to a "city tank". The upper level of the city tank flows to city water tank which is tested for phenol levels and discharged to the Galesburg sewer. Each quarter, the bottom of the city tank is cleanout and is recirculated to the start of the pretreatment cycle. Mr. Buchanan told me that a new automatic system is started in December 2024 and will have automatic control for urea, defoamer and pH addition instead of the current manual testing and addition. There are three operators for the pretreatment system on staff. Current best management practices for the pretreatment system are regular inspections and quarterly cleanout of the city tank. When other tanks are cleaned out, the waste is either cycled back to the start of the pretreatment system or discharged as hazardous waste.

The permitted sample location is at city water tank. Results are verified three times, by the analyzing laboratory, a third-party wastewater contractor and also by Mr. Buchanan before being sent to GBSD. A daily phenol sample is also collected. pH is analyzed on site and the results are added to the chain of custody form to ensure holding time is maintained. Mr. Buchanan told me that there was one total toxic organics (TTO) sample that had exceeded the IU permitted limits. As a result, the operational controls on the aeration tank were adjusted to slow the rate through the aeration tank and maintain a tighter management of the nutrient feed. After the adjustments the last TTO samples in June 2024 was within permitted limits. Flow is measured through an electronic flow meter which is calibrated annually.

After the previous discussion, EPA, GBSD and Koppers Representatives began a walkthrough of the pretreatment system. It consisted of sample compliance collection points for composite and grab samples (Photos 1-2), effluent holding tanks and the aeration tank (Photo 3). After the walkthrough, EPA and GBSD representatives closed out the inspection and left the facility at 10:35 am.

The Burlington Northern Santa Fe (BNSF) Railroad

EPA Representatives and GBSD Representatives met at BNSF Pretreatment Building at 10:45 am on December 5, 2024, and met with BNSF Representatives: Edmund Budzyn, Jr, Facility Manager; and Jay Garman, Manager Environmental Operations; and TRC Representatives: Alex Hibbard, Contract Operator and Jason McVeigh, Operator. EPA Representatives showed their inspector credentials to BNSF and TRC Representatives, and I asked whether any information that would be discussed was considered CBI. During the inspection, no information was claimed as CBI. I explained the purpose and scope of the inspection then we began a discussion of the facility and Ms. Young went through GBSD's inspection reporting sheet (Appendix B).

Mr. McVeigh described the wastewater entering the pretreatment system as mostly occurring from the diesel shop with some inputs from Building 400, locomotive fueling residuals and precipitation from various tracks and other industrial areas. Approximately 16 – 20 locomotives are rebuilt on site daily, and the peak season is prior to the December holidays. The facility does use dish detergent and degreasers for floor cleaning.

Mr. McVeigh described the pretreatment system operation as starting in dry bed, where the lift station pumps to grit chamber and rotary drum, oil water separator and dissolved air floatation (DAF). A second lift station pumps to the GBSD sanitary sewer. The pretreatment system does not have biological treatment but does have the chemical additives flocculant and cationic and anionic polymers which is used to precipitate out oil and hydrosulfuric acid used to boost polymer performance and lower pH to neutral. The compliance sample is collected after DAF treatment. The treatment system has the ability to recirculate the DAF tank to the start of treatment if a pH and turbidity check indicates that the wastewater is outside of range. Solids from DAF, drum screen and grit chamber are hauled as sludge by a contractor.

After the previous discussion, EPA, GBSD, BNSF and TRC Representatives began a walkthrough of the pretreatment system. It consisted of lift station, grit chamber (Photo 4), oil water separator (Photo 5), rotary drum, sludge tank (Photo 6), DAF (Photo 7), chemical storage (Photo 8) and sample compliance collection point (Photo 8). After the walkthrough, EPA and GBSD representatives closed out the inspection and left the facility at 11:45 am.

SECTION 6.0: SUMMARY OF FINDINGS

A. Areas of Concern

40 C.F.R. Part	File Reviews	Report Section
403.8 (f)(1)(iii)(B)(4) 403.12 (g)(6)	<i>Reporting requirements (including all monitoring results)</i> The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company requires that the IU to report all samples on semiannual basis, but does not include the requirement according to 403.12(g)(6) that if an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, the results of this monitoring shall be included in the report.	4.3 A
403.8 (f)(1)(iii)(B)(4)	<i>Notification of spills, bypasses, upsets, etc.</i> The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company Koppers Industries, Inc include conditions that if the facility experiences an upset, it must notify GBSD, but there is an no explicit prohibition of bypass or notification in the event of bypass.	4.3 A
403.8 (f)(1)(iii)(B)(4) 403.12(g)(2)	<i>24-hour notification of violation/resample requirement</i> The permits for Koppers Industries, Inc, BNSF and The Gates Rubber Company Koppers Industries, Inc Koppers Industries, Inc include a notification to notify GBSD within 24 hours of a sample result that has a permit exceedance, but there is not the provision to resample within 30 days according to 403.12(g)(2).	4.3 A
403.8 (f)(2)(v) 403.8 (f)(2)(vi)	<i>Sampling (once a year, except as otherwise specified)</i> <i>Sampling at frequency specified in approved program</i> <i>Analysis for all regulated parameters</i> GBSD has not been sampling for all of Burlington Northern Santa Fe Railroad's local limits during the three-year period reviewed. Local	4.3 C

	limits not sampled for include total cyanide, cadmium, selenium, TTO, arsenic, chromium, copper, lead, nickel, and zinc. Local limits should be sampled by GBSD once per year.	
403.12(g)(1)&(h) 136	<i>Analysis by IU of all required pollutants in accordance with appropriate sampling techniques and analytical methods</i> pH holding time on Burlington Northern Santa Fe Railroad reports is not within the 15-minute holding time interval.	4.3 E
403.12(l)	<i>IU signatory/certification of reports</i> Koppers Industries, Inc's periodic reports on continued compliance under 40 CFR 403.12(e) do not include the certification under 403.6(a)(2)(ii) and either a wet ink or CROMERR compliant signature.	4.3 E
403.8(f)(2)(v)	<i>Slug discharge control plan contains procedures for immediately notifying the POTW of slug discharges</i> Slug discharge control plans for Koppers Industries, Inc and The Gates Rubber Company do not contain procedures or numbers for notifying the POTW int the event of a spill.	4.3 E

APPENDIX A: Industrial Inspection Photo Log

Galesburg Sanitary District
EPA Inspection December 3-5, 2024
All photos taken by Eric Small, Physical Scientist, U.S. EPA
Camera: RICOH WG-4 GPS



1: RIMG0001

Description: Wastewater compliance sampling point for composite samples

Location: Koppers pretreatment system

Date/Time: December 5, 2024 10:13 AM



2: RIMG0002

Description: Wastewater compliance sample collection point for grab samples

Location: Koppers pretreatment system

Date/Time: December 5, 2024 10:15 AM



3: RIMG0003

Description: Top of aeration tank and pH probe

Location: Koppers pretreatment system

Date/Time: December 5, 2024 10:19 AM



4: RIMG0004

Description: Grit chamber tank and grating over lift station

Location: BNSF

Date/Time: December 3-5, 2024 11:26 AM



5: RIMG0005

Description: Oil water separator

Location: BNSF

Date/Time: December 5, 2024 11:31 AM

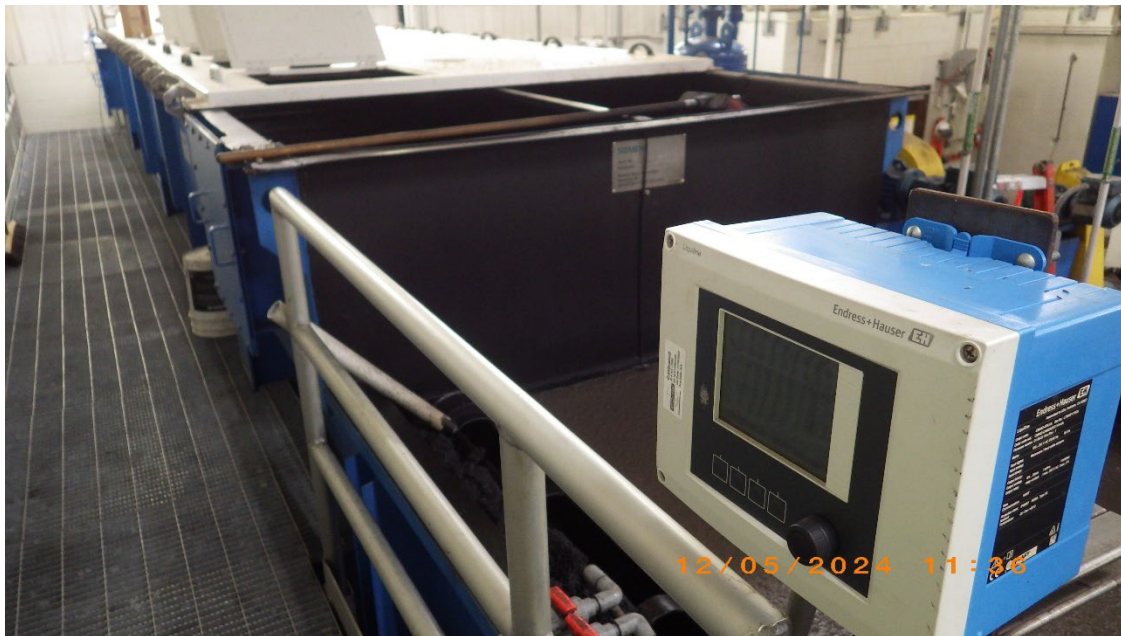


6: RIMG0006

Description: Sludge tank and dumpster for rotary drum solids. Floor drains flow to concrete sump

Location: BNSF

Date/Time: December 3-5, 2024 11:32 AM



7: RIMG0007

Description: Dissolved air floatation with probe

Location: BNSF

Date/Time: December 5, 2024

11:36 AM



8: RIMG0008

Description: secondary containment drains to concrete sump

Location: BNSF

Date/Time: December 3-5, 2024

11:37 AM



9: RIMG0009

Description: Sample collection port for auto sampler, installed on March 2023

Location: BNSF

Date/Time: December 3-5, 2024 11:37 AM

APPENDIX B: Galesburg Sanitary District Industrial User Checklist



INDUSTRIAL USER INSPECTION CHECKLIST

I. GENERAL INSPECTION INFORMATION			
Name of Industry:			
Date of visit:			
Inspection Type Purpose: Scheduled Complaint Permit Renewal Unscheduled New Industry Spill/Slug Enforcement Follow-up			
Name of inspectors/affiliation:			
Last inspection date:			
Inspected by:			
Did the previous inspection identify deficiencies that the industrial user was required to correct? Yes No			
Were deficiencies corrected? Yes No Explain:			
List all observed noncompliance issues and any corrective action that has been taken, or is planned:			
Name(s) and title(s) of industry representatives:			
II. GENERAL FACILITY INFORMATION			
Physical address of industry:			
Mailing address of industry:			
IU Permit Number:	Permit Exp Date:	IU Classification:	NAICS Code(s):
Is the industrial user permit on file at the facility? Yes No			
If the facility is a CIU, is it correctly categorized? Yes No			
Name of operation and reason for industrial user classification:			
Number of employees:	Number of shifts:	Hours of operation/Days per week:	
Are there scheduled shut down periods? Yes No		When:	
Is production seasonal? Yes No		When:	
Number of wastewater discharge points to the POTW:			
III. WASTEWATER PRODUCTION AND TREATMENT PROCESS			
<u>Comprehensive process description</u>			
Raw materials:			
Processes used:			
Finished products:			
Waste identification and destination:			
Is a process diagram on file at GSD?			
Describe any substantial changes in manufacturing processes that have occurred or are planned:			

What is the volume of flow discharged to the sewer?		
Has there been any changes to flow since the last inspection?		
Has production or flow increased or decreased greater than 20%?		
Describe any substantial changes in wastewater flow that have occurred or are planned:		
Did the industrial user report changes in process or flow to the POTW?		
Describe the condition of process areas:		
Describe any housekeeping concerns:		
Do floor drains/troughs lead to the sanitary sewer?		
Is a comprehensive piping diagram available at the facility?		
Are process tanks and storage tanks labelled?		
What chemicals are used in the cleaning of the production areas:		
Is wastewater generated from cleaning discharged to the sanitary sewer?		
Water source(s):		
Water usage:		
Describe water usage vs. wastewater discharge volume:		
How is water used at the facility?		
Is any credit given for water used?		
Is any wastewater hauled offsite?		
Is dilution of the wastewater stream occurring?		
Is a schematic of wastewater production and wastewater discharge points on file at GSD?		
IV. PRETREATMENT SYSTEM		
Is industrial wastewater treated prior to discharge to the sanitary sewer?		
Is process Continuous, Batch, or Combined flow?		
<u>Types of pretreatment processes utilized:</u>		
Dissolved air floatation	Membrane Tech	Ion Exchange
Centrifugation	Flow Equalization	Ozonation
Chemical Precipitation w/Clarifier	Oil/Water Separation	Reverse Osmosis
Sludge Filter Press	Sand or Grease Trap	Rotary Macro Screen
pH Adjustment	CN Destruction	Sedimentation
Belt Disk/Rope Oil Skimmer	Work Tank Agitation	Hex Cr Reduciton
Surfactants	De-Foaming	Biological Treatment
Grit Removal	Solvent Distillation	Chlorination
Silver Recovery	Segregation of Streams	Chelating Agents
Describe condition of pretreatment system:		
Are equipment maintenance records maintained and available for review?		
Does the industrial user have a critical spare parts inventory?		
Does the industrial user have a continuous pH monitoring system?		
Is the pretreatment system operator trained and certified?		
Describe operational upsets that have occurred since the last inspection:		
V: SLUG/SPILL CONTROLS AND BEST MANAGEMENT PRACTICES		

Does the facility have potential for a slug discharge?		
Has the facility had any past slug discharges or spills since the last inspection?		
Does the facility have a slug discharge or spill control plan?		On file at GSD?
Who has the authority to halt the discharge from the facility should a spill or slug discharge occur?		
What is the procedure for notifying GSD of a slug or spill?		
Describe permit required BMPs?		
Describe voluntary BMPs in place that prevent slugs or spills:		
VI. CHEMICAL STORAGE		
Identify chemicals onsite and how they are stored:		
Floor drains?	Can spilled chemicals reach floor drains if spilled?	
Is chemical containment utilized?		
How often are floors washed?	What chemicals are used?	
How often is equipment washed?	What chemicals are used?	
VII. SLUDGE AND SOLID WASTE GENERATION		
Does the facility generate sludge solids?		
How is the sludge dewatered?		
Volume sludge generated:	Where does liquid from dewatering process go?	
Disposal method:		
Hauling frequency:	Hauler:	Manifests available?
Is the sludge considered a valuable raw material?		
Describe solid waste disposal methods:		
VIII. HAZARDOUS WASTE GENERATION		
Is hazardous waste generated?		
Is hazardous waste discharged to sanitary sewer?		
Is hazardous waste containerized and labeled?		
Manner of hazardous waste disposal:		
Are hazardous waste manifests on file?		
IX. MONITORING, REPORTING AND RECORDKEEPING		
Monitoring/Sampling		
Describe sample location(s):		
Are there any concerns regarding the cleanliness or location of the sampling point?		
Who evaluates the data submitted to GSD?		
Was self-monitoring data reported to GSD at the expected frequency?		
Are samples collected, preserved and analyzed according to 40 CFR Part 136?		
Were samples collected at the required frequency in the permit?		
Were samples analyzed within required holding times?		
Are samples sent to a Contract lab?		
Name of contract lab:		
Was a Chain of Custody form used during sample collection?		
Was the COC completed properly?		
Recordkeeping		
All information kept for 3 years?		

Reporting
Do lab reports contain place, method and time of sample collection; name of person collecting the samples; dates of analysis; analyst ID; analytical methods used; results?
Describe deficiencies:
Recommendations for improvement of self-monitoring:
Were there any permit violations in the last year?
Was GSD notified of all violations identified by the industrial user within 24 hours of becoming aware?
Were resampling results following violations submitted within 30 days?
Are there any violations that were not reported to GSD?
X. WASTESTREAMS VERIFICATION/COMBINED WASTESTREAM FORMULA
How are flow volumes determined?
Is the facility using dilution to meet effluent limits?
Are there any dilution flows that have not been accounted for?
What type of flow measuring device is used?
How often is the flow measurement device calibrated?
Are calibration records available?
Can flow be measured at all sampling locations?
Are flows measured at each sampling location?
Is the Combined Wastestream Formula (CWF) used at the facility?
XI. NOTES , FOLLOW-UP AND ACTION ITEMS