

REPORT OF INDUSTRIAL STORMWATER COMPLIANCE EVALUATION INSPECTION

At

A1 Paint, Powder & Sandblasting, LLC

7601 E. 12th Street

Kansas City, MO 64126

NPDES Permit Number: Currently Exempt

On

March 6, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

Region 7: Enforcement And Compliance Assurance Division - Water Branch

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), Water Branch (WB), I performed a compliance evaluation inspection (industrial stormwater) at A1 Paint, Powder & Sandblasting on March 6, 2024. The inspection was conducted under the authority of Section 308(a) of the Federal Water Pollution Control Act, as amended. It was conducted in accordance with EPA Region 7 standard operating procedures for Clean Water Act compliance evaluation inspections (SOP No. 2332.11B). This narrative report presents the findings of the inspection.

PARTICIPANTS

A1 Paint, Powder & Sandblasting

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U.S. Environmental Protection Agency (EPA), Region 7

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INSPECTION PROCEDURES

Mr. Joe Heafner and I arrived at A1 Paint, Powder & Sandblasting (the “site” or “facility”) located at 7601 E. 12th Street in Kansas City, Missouri at 8:20 A.M. on March 6, 2024, for an unannounced inspection. We met with Mr. Frank Laster, president, in the lobby of the facility. We introduced ourselves, I presented my credentials, and I

explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet (Attachment 1), providing the U.S. EPA Small Business Resources Information Sheet and U.S. EPA Confidentiality Notice, evaluating stormwater management practices, and conducting a facility walkthrough with photographs (Attachment 2). The facility chose to not claim any confidential business information.

After providing a brief description of site operations, Mr. Laster stated he did not have any records related to stormwater management or regulatory permitting. We provided an overview on the requirements of the National Pollutant Discharge Elimination System (NPDES) general permit. Mr. Laster informed us that he was not aware of any NPDES permitting requirements for the facility.

Mr. Laster escorted Mr. Heafner and I on a visual inspection of the facility. The weather at the time of the inspection was dry with clear skies and the temperature was 40 degrees Fahrenheit. During my visual inspection of the facility, I observed one (1) stormwater sewer inlet at the north edge of the site (Photo #27) and exterior sandblasting operations south of the building (Photo #19). I did not observe any discharge or evidence of discharge during the site inspection.

After the facility walkthrough, we held a closing conference with Mr. Laster to summarize observations made during the site inspection. We discussed what would be required to obtain a Certificate of No Exposure, what a potential Standard Industrial Classification (SIC) code for the facility would be, and Stormwater Pollution Prevention Plan (SWPPP) requirements. We told Mr. Laster that the SIC code that likely applies to his facility is 3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring) which covers sandblasting of metal parts. We also discussed NPDES permitting exemption when discharging to a combined sewer system due to the facility's location within the Kansas City Combined Sewer System (CSS) service area. Mr. Laster was not aware of a sewer separation project on East 12th Street. I informed him that we would be following up with the City to confirm if the facility discharges to the CSS.

Three weeks later on March 26, 2024, I received a response from Dr. Jing Tao with KC Water on the status of the CSS at the facility's location on East 12th Street. Dr. Tao confirmed that the sewer inlet at the north edge of the site discharges to the CSS. She provided an image of sewer system features along East 12th Street showing the location of the combined sewer line and the facility's sewer inlet (Attachment 4).

Dr. Tao also added that because the City recently completed a sewer rehabilitation and cleaning project along East 12th Street adjacent to the facility, that this segment of the sewer line will likely remain combined for at least the next 5 years before a sewer separation project is completed.

I contacted Mr. Laster on March 26, 2024, and explained to him the status of the CSS and the City's separation project plans in the next 5 years. I also informed him that he

would need to contact the Missouri Department of Natural Resources (MDNR) for a permit once the sewer is separated.

FACILITY DESCRIPTION AND OPERATIONS

A1 Paint, Powder & Sandblasting is located at 7601 East 12th Street in Kansas City, Missouri. The site encompasses approximately 4.8 acres. The facility is located adjacent to the Blue River with a raised levee system separating the site from the river. The current operations began in approximately 2010.

The facility receives clean (unpainted) and galvanized steel parts from multiple steel fabricators including from the business AZZ Galvanizing that is located adjacent across East 12th Street. The steel product is sandblasted/brush blasted to profile the steel with a texture and promote surface coating adhesion. The sandblasted steel has powder coating applied inside interior paint booths and is then stored on drying racks. The facility also offers limited wet painting services if requested. Mr. Laster stated that the sandblasting material used is recycled coal slag fines (Black Diamond 20/40) sourced from Canfield & Joseph, Inc., a local industrial equipment supplier.

The site previously included three former buildings to the south of the current building that were demolished between 2006 and 2014. The space occupied by these former buildings is now used as a sandblasting area with limited product storage, and a yard containing spread/piled sandblasting material and former building debris. Sandblasting is conducted on the exterior south side of the building under a canopy. The accumulated sandblasting material is gathered and spread/piled in a dirt yard southeast of the building.

DRAINAGE PATTERNS

The east side drive is sloped north to channel storm water to a combined sewer system inlet adjacent to East 12th Street at the north edge of the site. There is a concrete stormwater channel at the north end of the drive that directs stormwater toward the inlet. The north side parking lot slopes to the east toward the CSS inlet. Due to the City being a combined sewer system in this area, all wastewater, including stormwater, is managed in the same infrastructure. During high flow events, this system discharges directly to the Missouri River.

Stormwater is detained on the former building pad and in the east adjacent yard due to a slight slope to the north and the higher elevation of the Blue River levee immediately south (see Attachment 3 site map). The west edge of the former building pad is elevated to slope to the east, preventing stormwater from flowing west toward the railroad easement. There are piles of dirt mixed with former building debris and sandblasting media on the east and south sides of the former building pad, and at the south, east, and west sides of the yard with stored sandblasting material. The piles have been

pushed together and function as berms for the former building pad and the sandblasting material storage yard.

The south-most portion of the site, south of the sandblasting operations, is relatively flat with no visible slope. There is a slight slope to the west for the land closer to the railroad easement. There is a vegetated ditch in the railroad easement that is sloped to the north similar to the facility grounds. A catchment basin/drop inlet is located in the railroad ditch at the East 12th Street crossing near the northwest corner of the site and west of the facility's sewer inlet. The railroad easement drop inlet is not present on the KC Water's sewer features map and there is no available documentation on it. Based on the presence of the combined sewer system here that is shown to be lined up with the easement's drop inlet, this is most likely a CSS discharge point for the easement (Attachments 3 & 4).

FINDINGS AND OBSERVATIONS

The facility is not covered by the State of Missouri NPDES general stormwater permit and is not required to develop or maintain Stormwater Pollution Prevention Plan (SWPPP). Mr. Laster stated that the facility does not have any documentation on stormwater management practices.

During the facility walkthrough, I observed one (1) stormwater sewer inlet at the north edge of the site (Photo #27). Dr. Jing Tao with KC Water confirmed that the inlet discharges to the Kansas City Combined Sewer System. A concrete conveyance channel directs water from the east side drive to the sewer inlet. There is a water meter located a few feet northwest of the sewer inlet that we saw overflowing from the grassy area into the inlet. Small pieces of trash were seen on the inlet grate. I saw soil from the water meter location migrating toward the inlet. We informed Mr. Laster of the water meter leak.

On the east side drive against the building exterior, I saw seven (7) empty 55-gallon drums stored (Photo # 4). The drums previously contained metal finishing fluid that was used on steel product prior to the powder coating process. Along the east side of the building, I saw piled up wood pallets and wood planks that are used for storing metal product off the concrete (Photo #3). There is a trash dumpster next to the piled wood pallets that I observed with an open lid (Photo #24). I saw common household trash in the dumpster including plastic bags, cardboard, styrofoam, and aluminum cans. Sandblasting material was seen accumulated in small amounts on the east side of the building next to stored material (Photo #22).

There is a former truck docking area located at the southern east side of the building (Photo #8). We saw an old, disconnected clay drainage pipe through broken concrete that extends east from the building toward the drive (Photo #7). There is a catchment basin for the former drainage pipe a few feet west of where the pipe is uncovered

(Photo #6). Mr. Laster had no information on the drainage pipe other than it being non-functional. The former truck docking area is being used for finished product storage.

South of the east side drive and southeast of the building is a storage yard for used sandblasting material (Photo #9). We saw accumulated sandblasting material spread throughout the surface of the yard and placed in small piles. Mr. Laster said that storm water is detained in this area and that excess stormwater flows north toward the building. He stated that a trench drain was installed at the south end of the building near the entrance to divert excess stormwater pooling against the building toward the east side drive (Photo #20). There are piles of dirt mixed with former building debris and sandblasting media on the south, east, and west sides of the yard (Photo #10). The piles have been pushed together and function as a berm for the yard where sandblasting material is stored. Mr. Laster stated that stormwater does not flow off-site to the south or toward the Blue River.

The sandblasting area is located on the exterior south end of the building and covered by a metal canopy (Photo #19). There is a sandblasting hose that extends out of the building under the canopy, and no mechanical equipment was present on the exterior. Metal product is placed on a rack and sandblasted with the hose. The sandblasting material used is Black Diamond brand coal slag fines. According to the Material Safety Data Sheet (MSDS) for the material, it contains trace amounts of beryllium and other metal oxides.

There is a former building pad located immediately south of the covered sandblasting area. Metal product and wood planks and pallets are stored on the pad, and accumulated sandblasting material was seen throughout the pad. The west edge of the pad is adjacent to a railroad easement, and I saw it is elevated to slope east. The water main for the former building was seen at the southeast corner of the pad. There are piles of dirt mixed with former building debris and sandblasting media on the south and east sides of the former building pad (Photos #12, 14). The piles have been pushed together and function as a berm for the pad near to where sandblasting is conducted. Mr. Laster said that storm water is detained on the pad similar to the sandblasting material storage yard immediately to the east, and that excess stormwater also flows north toward the building.

I observed visual evidence of wind erosion transporting sandblasting material south of the former building pad containment area (Photo #15). There is a deep ripple pattern from westerly air currents on the surface of the sandblasting material. This area looked like it was the previous extent of used sandblasting material storage prior to it being spread and piled in the east adjacent yard.

I saw additional evidence of wind erosion transporting sandblasting material across the west edge of the former building pad, which is the west property boundary (Photo # 18). Large quantities of sandblasting material, trash, and wood planks are present in the west adjacent railroad easement ditch. Mr. Laster stated that there are frequent heavy

winds and microbursts/downbursts that cause the materials to migrate toward the railroad easement. The concrete pad west of the building is a former rail car docking platform that is considered part of the railroad easement (Photo #17).

We saw a silt fence located at the top of the Blue River Levee that closely follows the site's east property boundary line. Mr. Laster stated that during improvement projects on the Blue River levee system, a silt fence was installed at the top of the levee. He was not aware if the silt fence is being maintained or if it will be removed in the future.

CONCLUSION

A1 Paint, Powder & Sandblasting's controls are inadequate to prevent polluted discharge, including from stormwater in contact with coal slag fines. Both structural and nonstructural controls are inappropriate for the facility. The site is located within the Kansas City Combined Sewer System and discharge goes to the CSS. Therefore, the facility is currently exempt from the requirements of the Missouri NPDES general stormwater permit. Concerns noted during the site inspection are summarized below:

1. The facility does not implement controls or Best Management Practices (BMPs) to contain sandblasting material (coal slag fines) and limit industrial material exposure to stormwater runoff.
2. Sandblasting material and trash have been transported off-site into the west adjacent railroad easement drainage ditch.
3. Loosely piled dirt berms at the south end of the sandblasting material storage yard may not be adequate to prevent stormwater runoff toward the Blue River during heavier rainfall events.

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COLLETIER

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ATTACHMENTS

1. NPDES Industrial Stormwater Worksheet (6 pages)
2. Image log and image location map (33 pages)
3. Site map (1 page)
4. KC Water CSS email and sewer map (1 page)