

# **REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION**

**AT  
Wilde Tool Company Inc  
1210 Pottawatomie St.  
Hiawatha, Kansas**

**KANSAS PRETREATMENT PERMIT: KSP000071**

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

**Enforcement and Compliance Assurance Division  
February 23, 2023**

## **INTRODUCTION**

I conducted an Industrial User Compliance Sampling Inspection at Wilde Tool in Hiawatha, Kansas, on February 23, 2023. 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**

Wilde Tool Company:

Kent Bieker, Plant Supervisor/Engineer  
Email: [kbieker@wildetool.com](mailto:kbieker@wildetool.com)

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

Joe Heafner, Life Scientist  
Email: [heafner.joseph@epa.gov](mailto:heafner.joseph@epa.gov)

## **FACILITY DESCRIPTION**

Wilde Tool Company manufactures hand tools which include pliers, punches, chisels and pry bars. The operations consist of forging and shaping various steels into tools then assembly of the tools is performed on site.

This facility is classified as subject to the Metal Finishing Point Source Category, 40 CFR Part 433, because of a black oxide (metal coloring) process (Outfall 001). In addition, the permit identifies a heat treat rinse water that discharges from the rinse tank and is known as Outfall 002.

At the time of the inspection, the black oxide line was not in operation. Mr. Bieker stated that the line is only used on the second shift and might only be used once or twice per week.

## **INSPECTION PROCEDURES**

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced on the morning of February 23, 2023, and introduced myself. I presented my credentials to Mr. Bieker, and explained the purpose and procedures of the inspection. I conducted the physical inspection of the facility and the processes that generate wastewater. I completed the Region 7 inspection checklist by early afternoon on February 23, 2023. 9 photos were taken during the inspection (attachment 4)

## **SAMPLING PROCEDURES**

On February 23, 2023, grab samples were taken from Outfall 002. The effluent grab samples were collected into clean containers for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. The grab samples that were collected on February 23, 2023, were analyzed for metals, cyanide, pH, and temperature values. The temperature and pH analysis were performed immediately on site.

All samples collected were transported to the EPA Region 7 Laboratory for analysis. All appropriate Region 7 standard operating procedures in the collection, packaging, transportation, and handling of the samples were followed.

## **FINDINGS AND OBSERVATIONS**

**1. Permit:** A Kansas Pretreatment Permit for Wilde Tool became effective on May 1, 2020, and will expire March 31, 2025 (attachment 1). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, silver, zinc), total toxic organics (TTOs), and cyanide. 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 Kansas Department of Health and Environment (KDHE) on a semi-annual basis, by January 28 and July 28 of each year.

**2. Discharge Monitoring Reports (DMRs):** I reviewed the facility's compliance status from 2019 through 2022 and found the facility in compliance for all the reporting periods.

**3. Water Balance:** An accurate water balance was achieved during the inspection. The facility utilizes two sources of water (city and three private on-site wells). The facility has meters on the on-site wells and averages the usage for the month. The facility also uses water in the heat treat process (Outfall 002) and the black-oxide line (Outfall 001). Daily flows for Outfall 001 range from 5,000 to 6,000 gallons during production and 500 - 600 gallons for Outfall 002 during production. With 45 employees the average employee consumption is about 10 gallons per day (gpd). This is within the range of 5 to 25 gpd that is considered normal. The facility utilizes the well water for cooling five furnaces. This water is sent to an on-site lagoon.

**4. Total Toxic Organics:** The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics provided it is following the provisions of its approved Solvent Management Plan (SMP). The SMP was readily available for review and appeared to be complete.

**5. Spill Control Plan:** The facility has a Spill/Slug Control Plan for petroleum products it stores on site. The plan lists all stored chemicals at the facility. The plan also describes all areas of the

production floor plan and locations of the parts washers and their relative proximity to drains. Mr. Bieker also stated during the inspection that all parts washers are not plumbed to any drains. During the inspection we verified that the parts washers are not plumbed to the drain system on the production floor. We determined that the potential for spilled chemicals to enter the sanitary sewer system was minimal.

**6. Sample Results:** Analytical results from samples collected during the inspection are presented in Table 1. The complete data package for analytical results is included as attachment 2. Sample results indicate compliance with parameters set in the permit.

| Sample Results For Wilde Tool, mg/L |              |      |              |      |              |      |              |      |             |      |              |      |              |      |              |      |           |     |  |
|-------------------------------------|--------------|------|--------------|------|--------------|------|--------------|------|-------------|------|--------------|------|--------------|------|--------------|------|-----------|-----|--|
|                                     | Ag           |      | Cd           |      | Cr           |      | Cu           |      | CN          |      | Ni           |      | Pb           |      | Zn           |      | pH (s.u.) |     |  |
|                                     | Dmax         | Mavg | Dmax         | Mavg | Dmax         | Mavg | Dmax         | Mavg | Dmax        | Mavg | Dmax         | Mavg | Dmax         | Mavg | Dmax         | Mavg | Min       | Max |  |
| Outfall                             | 0.43         | 0.24 | 0.11         | 0.07 | 2.77         | 1.71 | 3.38         | 2.07 | 1.2         | 0.65 | 3.98         | 2.38 | 0.69         | 0.43 | 2.61         | 1.48 | 5         | 10  |  |
| 001                                 | No Discharge |      | No Discharge |      | No Discharge |      | No Discharge |      | Not Sampled |      | No Discharge |      | No Discharge |      | No Discharge |      | NA        |     |  |
| Result:                             | NA           |      | NA           |      | NA           |      | NA           |      | NA          |      | NA           |      | NA           |      | NA           |      | NA        |     |  |
| 002                                 | ND           |      | ND           |      | 0.0169       |      | 0.0339       |      | Not Sampled |      | ND           |      | ND           |      | < 0.2        |      | 7.94      |     |  |
| Result:                             | C            |      | C            |      | C            |      | C            |      | C           |      | C            |      | C            |      | C            |      | C         |     |  |

**7. Other Observations:** During the inspection, I observed uncovered dumpsters that contained scrap metal. Mr. Bieker stated that the metal is removed as needed and sent to a metal recycler. Based on the facility's Standard Industrial Classification of 3423, the facility might be required to seek coverage for industrial stormwater discharges from the facility in accordance with 40 CFR122.26 (b)(14)(xi). Wilde Tool should work with KDHE to obtain a permit for industrial stormwater discharges from the facility or make a determination for a no exposure exemption.

JOSEPH  
HEAFNER  
Joe Heafner  
Life Scientist

Digitally signed by  
JOSEPH HEAFNER  
Date: 2023.04.07  
10:14:50 -05'00'

Moran,  
Nicole  
Nicole Moran  
Section Chief

Digitally signed by Moran,  
Nicole  
Date: 2023.04.07  
11:33:24 -05'00'

**Attachments:**

1. Pretreatment Permit (15 pages)
2. Data Transmittal for Project JAH2309 (17 pages)
3. EPA Industrial User Inspection Checklist (6 pages)
4. Photos and photo log (6 pages)