



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8ENF-W-NW

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Bryon Long
Operator
Mesa Verde National Park
Bryon_Long@nps.gov

Re: Inspection Report for Mesa Verde National Park Wastewater Treatment Facilities, NPDES
Permit No. CO0034398

Dear Mr. Long:

On July 13, 2021, representatives of the U.S. Environmental Protection Agency inspected the Mesa Verde National Park (MVNP) Wastewater Treatment Facilities located in Montezuma County, Colorado, to evaluate compliance with the facilities' National Pollutant Discharge Elimination System permit for wastewater. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Inspection findings are summarized within the enclosed inspection report in a table titled "Findings, Corrective Actions and Recommendations." Within **thirty (30) days** of receipt of this report, please provide the EPA with a summary of corrective actions taken to address each of the findings identified in the report and any information that may change the findings or content of the report. This summary should be sent to:

Stephanie Meyers
meyers.stephanie@epa.gov

Please contact me at 303-312-6938 or meyers.stephanie@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,
STEPHANIE
MEYERS

Digitally signed by
STEPHANIE MEYERS
Date: 2021.09.09 15:16:07
-06'00'

Stephanie Meyers
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

- 1) MVNP WWTF NPDES Inspection Report – Wastewater
- 2) MVNP WWTF Photo Log

cc: Leslie Ramone, Intern/Operator, Mesa Verde National Park (via email)
Wade Jordan, Operator, Mesa Verde National Park (via email)
Michael Rubin, Facility Manager, Mesa Verde National Park (via email)

NPDES Inspection Report – Wastewater

National Database Information	
Inspection Date: July 13, 2021	Inspection Type: CEI - Wastewater Treatment Facility
Entry/Exit Time: 7:05 am / 5:30 pm	NPDES ID Number: CO0034398
NAICS Code: 221320	Inspection ID: 202107 CO0034398
Lead inspector and affiliation: Stephanie Meyers / EPA Region 8	
Inspector and affiliation: Emilio Llamozas / EPA Region 8	
Inspector and affiliation: Michelle Lanzoni / EPA Region 10	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: Mesa Verde National Park Wastewater Treatment Facilities Montezuma County, Colorado	Email Report to: Mr. Bryon Long Operator Mesa Verde National Park Bryon_Long@nps.gov

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Bryon Long / Operator / MVNP / primary lead during the inspection
	Wade Jordan / Operator / MVNP / present during inspection
	Leslie Ramone / Intern & Operator / MVNP / present during inspection
Person/Company meeting definition of “Operator”	Mesa Verde National Park
Authorized Official(s) (Per NOI?)	Michael Rubin / Facility Manager / Mesa Verde National Park

Permit Information		
Is the permit on site and available? Yes	Lagoon Category: Individual Permit	Monitoring Frequency: Quarterly
Effective Date: September 1, 2019	Expiration Date: January 30, 2024	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Owner – Bill Nelligan 970-529-4607 Operator – Bryon Long 970-529-5056	
Receiving Water(s): Unnamed tributaries of the Mancos River. Outfall 001 from Cedar Tree Facility discharges to an unnamed drainageway in Spruce Canyon. Outfall 002 from Far View Facility discharges to an unnamed drainageway in Little Soda Canyon. Outfall 003 from Morefield Facility discharges to an unnamed drainageway in Morefield Canyon. Outfall 004 from Wetherill Mesa Facility discharges to an unnamed drainageway in Bobcat Canyon.		
Discharge point location (longitude, latitude): There are four outfalls at the facilities as indicated below: Outfall 001 from Cedar Tree Facility – Lat. 37.197242°, Long. -108.485464° Outfall 002 from Far View Facility – Lat. 37.255283°, Long. -108.489703° Outfall 003 from Morefield Facility – Lat. 37.274444°, Long. -108.416111°		

Outfall 004 from Wetherill Mesa Facility – Lat. 37.190833°, Long. -108.531889°
Regulatory Inspector's source of information: Statement of basis for the permit, permit, facility representatives and facility observations.

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

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/25/2021
	303-312-6938	
Reviewer Name	Address/Phone Number	Date
Emilio Llamozas	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/8/2021
	303-312-6407	
Supervisor Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/9/2021
Michael Boeglin	303-312-6250	

Inspection Narrative and Site Description

The inspection was conducted at the Mesa Verde National Park Wastewater Treatment Facilities (WWTFs or facilities) located in Montezuma County, Colorado to evaluate compliance with their National Pollutant Discharge Elimination System (NPDES) permit. The EPA is responsible for implementing the NPDES program for Federal Facilities within the State of Colorado. The inspection was announced a few weeks prior to the inspection to coordinate logistics for the inspection. On July 13, 2021, U.S Environmental Protection Agency (EPA) inspectors Stephanie Meyers, Emilio Llamozas, and Michelle Lanzoni met with operators Bryon Long, Wade Jordan, and Leslie Ramone with Mesa Verde National Park. The EPA inspectors presented their credentials and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to inspect the facilities and asked questions to the facility representatives to help the inspectors evaluate compliance with the facilities' permit. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.

Mesa Verde National Park has four wastewater treatment facilities (Wetherill Mesa, Cedar Tree, Far View, and Morefield) that serve visitors and residents of the park. Inspectors first inspected the Wetherill Mesa facility (Outfall 004), which is a two-cell lagoon system that receives wastewater from two comfort stations in Wetherill Mesa. This facility does not discharge. The eastern cell (photo 25) receives wastewater from the Badger House comfort station, and the western cell (photo 28) receives wastewater from the Wetherill Mesa parking lot comfort station. The inspectors and facility representatives walked around the interior of the lagoon enclosure to evaluate berm integrity and the facility's discharge status. Prairie dog burrows were observed along the berms of both cells (photos 26 and 29). There was vegetation over six inches in height around the western berm of the eastern cell (photo 27). There was also tumbleweed inside the western cell (photo 28).

Inspectors then visited the White House lift station (photo 31), which receives wastewater via gravity flow from the park's residential homes, and pumps wastewater to the Cedar Tree wastewater treatment facility. The lift station is brand new and was installed approximately two weeks prior to the inspection. It contains a back-up generator that is tested automatically once a week.

The inspectors then went to inspect the Headquarters lift station (photo 32), which receives wastewater from all the MVNP Headquarters area of the park and pumps wastewater to the Cedar Tree wastewater treatment facility. The lift station has a back-up generator that is tested monthly.

Lift Station Name	Latitude	Longitude
White House lift station (photo 31)	37.19287°	-108.48932°
Headquarters lift station (photo 32)	37.18340°	-108.48874°

After inspecting the Headquarters lift station, inspectors arrived at the Cedar Tree wastewater treatment facility (Outfall 001), which is a three-cell lagoon system that serves the Chapin Mesa area of the park and receives wastewater from the White House and Headquarters lift stations. Wastewater flows and is pumped to cell 1 (photo 33), which contains a cover to prevent sunlight from assisting in algae growth. Cell 2 is not used but is filled with wastewater to protect the liner (photo 34). Wastewater from cell 1 flows directly to the LemTec Biological Treatment Process installed during the third quarter of 2020, which is composed of two ponds (aeration and settling pond) to meet the Biochemical Oxygen Demand (BOD) and ammonia limits (photo 35). After wastewater is treated for BOD and ammonia, it flows to cell 3, which functions as a polishing cell (photo 36). Wastewater from cell 3 then flows to the wet well where drip chlorination takes place for disinfection (photo 37). Sodium sulfate tablets are then used to

dechlorinate water (photo 38), and sampling takes place after dechlorination and before effluent is discharged to an unnamed tributary that flows into Spruce Canyon and reaches the Mancos River (photo 39).

The inspectors then conducted a records review of sampling and laboratory records from the fourth quarter of 2019 to evaluate the facility's compliance with effluent limits and use of EPA approved sampling and analysis methods.

After the records review, inspectors went to inspect the Far View lift station and wastewater treatment facility (Outfall 002). The lift station (photo 40) receives wastewater from the lodge, housing, and all Far View buildings and pumps wastewater up near a roadway, then wastewater gravity flows to the Far View wastewater treatment facility. This facility is a three-cell lagoon system where wastewater is first received by cell 1 (photo 41), which then flows to cell 2 (photo 42). Wastewater from cell 2 flows to the LemTec Biological Treatment Process and is treated for BOD and ammonia (photo 43), then flows into cell 3, which functions as a polishing pond (photo 45). Treatment occurs in the package plant, where a polymer, sodium hypochloride, and alum AS-3030 are injected (photo 46). Dechlorination occurs (photo 47) before effluent is discharged to an unnamed tributary that flows into Little Soda Canyon and reaches the Mancos River (photo 44).

Lift Station Name	Latitude	Longitude
Far View lift station (photo 40)	37.25743°	-108.49825°

The inspectors then went to inspect the Morefield wastewater treatment facility, which is a two-cell lagoon system that receives wastewater from a store, café, laundromat, comfort stations, and other various facilities. This facility does not discharge. Vegetation was observed growing inside of cell 1 in the northeast corner (photo 48). Cell 2 was dry and contained sludge (photo 49).

At the end of the day, the inspectors held a closing conference with Mr. Long, Mr. Jordan, and Ms. Ramone where they discussed preliminary findings. On July 27, 2021, the EPA sent an email to Mr. Long, Mr. Jordan and Ms. Ramone with the preliminary findings from the inspection.

Findings, Corrective Actions and Recommendations

Finding #1: There is no schedule for routine operations and maintenance at the wastewater treatment facilities.

Routine operations and maintenance activities are not conducted at the wastewater treatment facilities on a regular schedule.

Permit requirements:

Part 3.6.1 of the permit states, “The Permittee shall, as soon as reasonable and practicable, but no later than six (6) months after the effective date of this Permit, do the following as part of the operation and maintenance program for the wastewater treatment facility:

3.6.1.1 Have a current O&M Manual(s) that describes the proper operational procedures and maintenance requirements of the wastewater treatment facility;

3.6.1.2 Have a current O&M Manual(s) readily available to the operator of the wastewater treatment facility and require that the operator become familiar with the manual(s) and any updates;

3.6.1.3 Have a schedule(s) for routine operation and maintenance activities at the wastewater treatment facility; and,

3.6.1.4 Require the operator to perform the routine operation and maintenance requirements in accordance with the schedule(s).”

Corrective Action:

Create a schedule for routine operation and maintenance activities at the wastewater treatment facilities. Provide the EPA with a schedule for routine operation and maintenance activities for each of the wastewater treatment facilities in order to address this finding.

Finding #2: Samples for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Dissolved Solids (TDS), and ammonia were not preserved at $\leq 6^{\circ}\text{C}$ as required by 40 C.F.R. 136.

Chain of custody forms and laboratory results from 2019 indicated that total suspended solids samples received by the lab were not preserved at $\leq 6^{\circ}\text{C}$ as required by 40 C.F.R. 136. The BOD and TSS samples collected from Cedar Tree on October 16, 2019 at 8:30 am were received by the lab on October 16, 2019 at 1:30 pm with a temperature of 21.6°C . The TDS and ammonia samples collected from Cedar Tree on October 16, 2019 at 8:30 am were received by the lab on October 16, 2019 at 1:20 pm with a temperature of 12.3°C .

Permit requirement:

Part 2.2 of the permit states, “Monitoring must be conducted according to test procedures approved under 40 C.F.R. 136, unless other test procedures have been specified in this Permit.”

Table II of 40 C.F.R. §136.3 indicates that BOD, TSS, TDS and ammonia samples must be preserved at or below 6°C .

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. Mr. Long will ensure samples are delivered on ice and has also

spoken with the laboratory and has ensured the laboratory will properly preserve samples once they are received. No further action is needed.

Finding 3: The methods used to analyze Total Residual Chlorine and pH were not documented in sample log sheets.

A review of sample log sheets indicated that the methods used to analyze Total Residual Chlorine and pH were not recorded or documented.

Permit Requirements:

Part 2.6 of the permit states, "Records of monitoring information shall include:

2.6.1 The date, exact place, and time of sampling or measurements;

2.6.2 The name(s) of the individual(s) who performed the sampling or measurements;

2.6.3 The date(s) analyses were performed;

2.6.4 The time(s) analyses were initiated;

2.6.5 The name(s) of individual(s) who performed the analyses;

2.6.6 References and, when available, written procedures for the analytical techniques or methods used; and,

2.6.7 The results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results."

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. A new form was submitted, which includes the analytical techniques or methods used for sampling. No further action is needed.

Finding #4: A thermometer is not kept in refrigerators where composite samples are stored.

A thermometer is not kept in refrigerators where composite samples for TSS are stored. Thermometers should be kept in refrigerators containing samples to ensure samples are preserved at $\leq 6^{\circ}\text{C}$ as required by 40 C.F.R. 136.

Permit Requirement:

Part 2.2 of the permit states, "Monitoring must be conducted according to test procedures approved under 40 C.F.R. 136, unless other test procedures have been specified in this Permit."

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. A lab certified thermometer has been placed in each refrigerator where composite samples are stored. No further action is needed.

Finding #5: Animal burrows surround the berms of both cells at Wetherill Mesa.

A significant number of animal burrows surround the berms of both cells at Wetherill Mesa (photos 26 and 29).

Permit Requirements:

Part 3.5.1 of the permit states, "On at least a weekly basis, unless otherwise approved by the Permit issuing authority, the Permittee shall inspect its wastewater treatment facility, at a minimum, for the following:

3.5.1.1. Determine if a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Parts 1.3.5 and 2.4 of this Permit if not already done.);

3.5.1.2. Check to see if there is any leakage through the dikes;

3.5.1.3. Check to see if there are any animal burrows in the dike;

3.5.1.4. Check to see if there has been any excessive erosion of the dikes;

3.5.1.5. Check to see if there are any rooted plants, including weeds growing in the water;

3.5.1.6. Check to see if vegetation growth on the dikes needs mowing; and,

3.5.1.7. Determine if proper operation and maintenance procedures are being undertaken at the wastewater treatment facility."

Part 3.6 of the permit states, "The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the Permit. However, the Permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance."

Corrective Action:

Ensure that animals are not burrowing around the berms of cells, and make any necessary repairs caused by animal burrows. Provide the EPA with photos and a description of the corrective actions taken to address this finding.

Finding #6: There was vegetation and bushes over six inches in height.

Vegetation and bushes over six inches in height were found to be growing between the two cells at Wetherill Mesa (photo 27).

Permit requirements:

Part 3.5.1 of the permit states, "On at least a weekly basis, unless otherwise approved by the Permit issuing authority, the Permittee shall inspect its wastewater treatment facility, at a minimum, for the following:

3.5.1.1. Determine if a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Parts 1.3.5 and 2.4 of this Permit if not already done.);

3.5.1.2. Check to see if there is any leakage through the dikes;

3.5.1.3. Check to see if there are any animal burrows in the dike;

3.5.1.4. Check to see if there has been any excessive erosion of the dikes;

3.5.1.5. Check to see if there are any rooted plants, including weeds growing in the water;

3.5.1.6. Check to see if vegetation growth on the dikes needs mowing; and,

3.5.1.7. Determine if proper operation and maintenance procedures are being undertaken at the wastewater treatment facility.”

Part 3.6 of the permit states, “The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the Permit. However, the Permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.”

Corrective Action:

Remove the overgrown vegetation and trees growing between the two cells at Wetherill Mesa. Provide the EPA with photos and a description of the corrective actions taken to address this finding.

Finding #7: There was a TDS exceedance during the first quarter of 2019 at the Cedar Tree wastewater treatment facility.

During the first quarter of 2019, there was a TDS exceedance at the Cedar Tree wastewater treatment facility. The permit indicates that the concentration of TDS in the discharge shall not be greater than 400 mg/L above the TDS concentration of the raw potable water. The TDS sample result for the 4th quarter of 2019 for Cedar Tree (Outfall 001) was 450 mg/L above the TDS concentration of the raw potable water. Facility representatives indicated this exceedance was due to excess soda ash being added to the reactor.

Permit requirement:

Part 1.3.1 of the permit states, “Effective immediately and lasting through the life of this Permit, the quality of effluent discharged by the facility shall, at a minimum, meet the limitations as set forth below:”

Effluent Characteristic	Effluent Limitation		
	30-Day Average a/	7-Day Average a/	Daily Maximum a/
Flow, mgd	0.085	N/A	N/A
Biological Oxygen Demand (BOD5), mg/L	30	45	N/A
Total Suspended Solids (TSS), mg/L	30	45	N/A
<i>E. coli</i> , #/100 mL	126	N/A	N/A
Total Residual Chlorine (TRC), mg/L	0.011	N/A	0.019
Ammonia –Nitrogen (as N), mg/L			
January	5.1	N/A	13
February	4.7	N/A	11
March	3.2	N/A	7.3
April	1.9	N/A	6.1
May	2.4	N/A	7.9
June	3.0	N/A	10
July	2.3	N/A	9.7
August	1.9	N/A	7.9
September	2.3	N/A	8.7
October	3.4	N/A	11
November	3.7	N/A	11
December	3.7	N/A	8.9
The pH of the effluent shall not be less than 6.5 or greater than 9.0 in any single sample or analysis.			
The concentration of oil and grease in any single sample shall not exceed 10 mg/L. There shall be no visible sheen in the receiving water or on the adjoining shoreline.			
The concentration of Total Dissolved Solids (TDS) in the discharge shall not be more than 400 mg/L greater than (incremental increase of 400 mg/L) the TDS concentration in the raw potable water supply before treatment.			
There shall be no discharge of floating solids or visible foam in other than trace amounts.			

a/ See Definitions, Part 1.1, for definition of terms.

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. A newer chemical feed pump has been installed so overfeed of soda ash no longer occurs. No further action is needed.

Finding #8: EPA was not notified of the above-mentioned TDS exceedance.

EPA was not notified of the above-mentioned TDS exceedance described in Finding #7 within 24 hours from the time MVNP first became aware of the exceedance and MVNP did not provide a 5-day follow up report to the EPA of the exceedance.

Permit requirements:

Part 2.8 of the permit states, “2.8.1. The Permittee shall report any noncompliance which may endanger health or the environment as soon as possible, but no later than twenty-four (24) hours from the time the Permittee first became aware of the circumstances. The report shall be made to the EPA, Region 8, Site Assessment/Emergency Response Program at (303) 293-1788, and the state of Colorado at (303) 518-5608.

2.8.2. The following occurrences of noncompliance shall be reported by telephone to the EPA, Region 8, NPDES and Wetland Enforcement Section at (800) 227-8917 (8:00 a.m. - 4:30 p.m. Mountain Time) and the state of Colorado at (303)-692-3590 (8:00 a.m. - 4:30 p.m. Mountain Time) by the first workday following the day the Permittee became aware of the circumstances:

- 2.8.2.1. Any unanticipated bypass which exceeds any effluent limitation in the Permit (See section 3.8, Bypass of Treatment Facilities.);
- 2.8.2.2. Any upset which exceeds any effluent limitation in the Permit (See section 3.9, Upset Conditions); or,
- 2.8.2.3. Violation of a maximum daily discharge limitation for any of the pollutants listed in the Permit to be reported within 24 hours.
- 2.8.3. A written submission shall also be provided to the U.S. EPA, Office of Enforcement and Compliance Assurance Division, and to the state of Colorado within five days of the time that the Permittee becomes aware of the circumstances. The written submission shall contain:
- 2.8.3.1. A description of the noncompliance and its cause;
- 2.8.3.2. The period of noncompliance, including exact dates and times;
- 2.8.3.3. The estimated time noncompliance is expected to continue if it has not been corrected; and,
- 2.8.3.4. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
- 2.8.4. The Director may waive the written report on a case-by-case basis for an occurrence of noncompliance listed under section 2.8.2 above, if the incident has been orally reported in accordance with the requirements of section 2.8.2.
- 2.8.5. Reports shall be submitted to the addresses in section 2.4.1, Reporting of Monitoring Results.”

Corrective Action:

Ensure that the EPA is notified of any exceedances of effluent limitations within 24 hours from the time MVNP first becomes aware of the exceedance, and that a written report is submitted to the EPA within five days from the time MVNP first becomes aware of the exceedance.

Finding #9: The TSS value reported for October of 2019 was reported as an estimated value for the Cedar Tree wastewater treatment facility.

The total suspended solids (TSS) sample collected on October 16, 2019 was reported by the San Juan Basin Public Health Lab as <10 mg/L and was estimated as 1 mg/L. MVNP reported in NetDMR the 1 mg/L for TSS instead of the <10 mg/L value for the third quarter of 2019.

Permit requirements:

Part 1.3.5 of the permit states, “At a minimum, upon the effective date of this Permit, the following constituents shall be monitored at the frequency and with the type of measurement indicated; samples or measurements shall be representative of the volume and nature of the monitored discharge. If no discharge occurs during the entire monitoring period, it shall be stated on the Discharge Monitoring Report that no discharge or overflow occurred.”

Effluent Characteristic	Frequency	Sample Type a/ b/
Flow, mgd c/	Weekly	Instantaneous
BOD ₅ , mg/L	d/	Grab
TSS, mg/L	d/	Grab
<i>E. coli</i> , #/100 mL	Quarterly	Grab
TRC, mg/L e/	Weekly	Grab
pH, standard units	Weekly	Grab
Oil and Grease, mg/L	f/	Grab
Oil and Grease Sheen	Weekly	Observation f/
Ammonia as Nitrogen, mg/L	Monthly	Grab
TDS, mg/L g/	Quarterly	Grab
Temperature, °C	Weekly	Instantaneous
Total Nitrogen (sum of TKN, nitrate and nitrite), mg/L	Quarterly h/	Composite
Total Phosphorus, mg/L	Quarterly h/	Composite

a/ See Definitions, Part 1.1, for definition of terms.

b/ Samples for flow, pH, and temperature shall be collected at the same time.

c/ Flow measurements of effluent volume shall be made in such a manner that the Permittee can affirmatively demonstrate that representative values are being obtained. The average flow rate (in gallons per day) during the reporting period and the daily maximum flow (maximum volume discharged during a 24-hour period) shall be reported.

d/ The frequency of monitoring for BOD₅ and TSS shall be monthly from April through September and quarterly from October through March.

e/ The analysis for TRC shall be conducted using reliable devices (Equivalent to Standard Methods 4500-C1-G, Spectrophotometric, DPD). The method achieves a method detection limit of less than 50 µg/L. In the calculation of average TRC concentrations, those analytical results that are less than the method detection limit shall be considered to be zero for calculation purposes. If all individual analytical results that would be used in the calculations are below the method detection limit, then "< 50 µg/L" shall be reported on the quarterly Discharge Monitoring Report (DMR). Otherwise, report the calculated value.

f/ In the event that an oil sheen or floating oil is observed, a grab sample shall be taken immediately and analyzed in accordance with the requirements of 40 CFR Part 136 and reported. The analytical result shall not exceed 10 mg/L in any sample.

g/ Samples of the raw potable water intake before treatment and effluent from Outfall 001 shall be collected and analyzed for TDS on a quarterly basis. Electrical conductivity measurements may be substituted for TDS measurements if a satisfactory correlation is established on a minimum of five (5) samples.

h/ Samples shall be conducted on a two (2) day progression; i.e., if the first sample is on a Monday, during the next sampling period sampling shall begin on a Wednesday, etc. The sampling day shall be recorded in the daily log and reported.

Part 2.2 of the permit states, "Monitoring must be conducted according to test procedures approved under 40 C.F.R. 136, unless other test procedures have been specified in this Permit."

Part 2.4 of the permit states, "With the effective date of this Permit, the Permittee must electronically report DMRs quarterly using NetDMR. Electronic submissions by Permittees must be submitted quarterly to the EPA Region 8 no later than the 28th of the month following the completed reporting

period. The Permittee must sign and certify all electronic submissions in accordance with the requirements of section 4.7 of this Permit (“Signatory Requirements”). NetDMR is accessed from the internet at <https://netdmr.zendesk.com/home>.”

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. Mr. Long has acknowledged this error and will ensure the correct value is reported going forward. No further action is needed.

Finding #10: The incorrect value for Total Kjeldahl Nitrogen was reported during the fourth quarter of 2019 for the Cedar Tree wastewater treatment facility.

The Cedar Tree discharge monitoring report (DMR) for the 4th quarter of 2019 reported a Total Kjeldahl Nitrogen (TKN) of 168 mg/L; however, the value reported by the lab was 1.68 mg/L.

Permit Requirement:

See part 1.3.5 of the permit above.

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. Correct and resubmit the DMR for the 4th quarter of 2019 TKN value for Cedar Tree (Outfall 001) to 1.68 mg/L.

Finding #11: The discharge documentation spreadsheet did not have a section to document that the discharge was free of floating solids or visible foam.

The discharge documentation spreadsheet did not have a section to document that the discharge was free of floating solids or visible foam in other than trace amounts.

Permit Requirement:

See part 1.3.1 of the permit above.

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. A new form was submitted, which includes a column for documenting whether the discharge was free of floating solids or visible foam. No further action is needed.

Finding #12: There was an ammonia exceedance during October 2019 at the Far View wastewater treatment facility.

There was an ammonia exceedance during October 2019 at the Far View wastewater treatment facility. The permit indicates that the 30-day average concentration of ammonia effluent limit for October is 3.4 mg/L. The 30-day average ammonia effluent concentration for the month of October 2019 for Far View wastewater treatment facility (Outfall 002) was 3.5 mg/L. Facility representatives indicated this exceedance was due the reactor not being installed until the 3rd quarter of 2020.

Permit requirement:

Part 1.3.2 of the permit states, “Effective immediately and lasting through the life of this Permit, the quality of effluent discharged by the facility shall, at a minimum, meet the limitations as set forth below:”

Effluent Characteristic	Effluent Limitation		
	30-Day Average a/	7-Day Average a/	Daily Maximum a/
Flow, mgd	0.05	N/A	N/A
BOD5, mg/L	30	45	N/A
TSS, mg/L	30	45	N/A
<i>E. coli</i> , #/100 mL	126	N/A	N/A
TRC, mg/L	0.011	N/A	0.019
Ammonia –Nitrogen (as N), mg/L			
January	5.1	N/A	13
February	4.7	N/A	11
March	3.2	N/A	7.3
April	1.9	N/A	6.1
May	2.4	N/A	7.9
June	3.0	N/A	10
July	2.3	N/A	9.7
August	1.9	N/A	7.9
September	2.3	N/A	8.7
October	3.4	N/A	11
November	3.7	N/A	11
December	3.7	N/A	8.9
The pH of the effluent shall not be less than 6.5 or greater than 9.0 in any single sample or analysis.			
The concentration of oil and grease in any single sample shall not exceed 10 mg/L. There shall be no visible sheen in the receiving water or on the adjoining shoreline.			
The concentration of TDS in the discharge shall not be more than 400 mg/L greater than (incremental increase of 400 mg/L) the TDS concentration in the raw potable water supply before treatment.			
There shall be no discharge of floating solids or visible foam in other than trace amounts.			

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action has been addressed. The facility installed the reactors in the 3rd quarter of 2020 to treat the wastewater for ammonia. No further action is needed.

Finding #13: EPA was not notified of the above-mentioned ammonia exceedance.

EPA was not notified of the above-mentioned ammonia exceedance described in Finding #12 within 24 hours from the time MVNP first became aware of the exceedance and MVNP did not provide a 5-day follow up report to the EPA of the exceedance.

Permit requirement:

See part 2.8 of the permit above.

Corrective Action:

Ensure that the EPA is notified of any exceedances of effluent limitations within 24 hours from the time MVNP first becomes aware of the exceedance, and that a written report is submitted to the EPA within five days from the time MVNP first becomes aware of the exceedance.

Finding #14: There was vegetation growing inside of the first cell at the Morefield wastewater treatment facility.

Vegetation was found to be growing inside the northeast corner of the first cell at the Morefield wastewater treatment facility (photo 48).

Permit requirement:

See part 3.5.1 of the permit above.

Part 3.6 of the permit states, “The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the Permit. However, the Permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.”

Corrective Action:

Remove the vegetation growing inside of the first cell at the Morefield wastewater treatment facility. Provide the EPA with photos and a description of the corrective actions taken to address this finding.

Finding #15: Cell 2 was dry and had sewage sludge in the cell at the Morefield wastewater treatment facility.

Cell 2 at the Morefield wastewater treatment facility was dry and contained sewage sludge in the cell.

Permit requirement:

Part 3.6 of the permit states, “The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the Permit. However, the Permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.”

Corrective Action:

On August 19, 2021, EPA received information from Mr. Long with Mesa Verde National Park that this corrective action will be addressed. Wastewater will flow into cell 2 to protect the liner and ensure sludge is not carried away by the wind. Provide the EPA with photos of the cell after wastewater has been added.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

February 7, 2022

Ref: 8ENF-W-NP

RETURN EMAIL RECEIPT REQUESTED

Tasha Greene
Environmental Health and Safety Manager
Metal Container Corporation
tasha.greene@anheuser-busch.com

**Re: Pretreatment Compliance Sampling Inspection, Metal Container Corporation,
Windsor, CO, NPDES ID# COPF00102**

Dear Ms. Greene:

The U.S. Environmental Protection Agency (EPA) conducted a Compliance Sampling Inspection (CSI) at Metal Container Corporation, located at 1201 Metal Container Court, Windsor, CO 80550 from August 2, 2021 through August 3, 2021. The objective of the CSI was to evaluate Metal Container Corporation's monitoring point to ensure it allows representative sampling of the process wastewater discharge for the production day. In addition, EPA conducted sampling at the monitoring point to gather information necessary to determine compliance with the requirements and limitations in the Coil Coating-Can Making Point Source Category, Pretreatment Standards for New Sources under 40 CFR 465.45, and the General Pretreatment Regulations under 40 CFR Part 403.

The enclosed CSI report contains the sampling procedure, observations and findings from the sampling conducted from August 2, 2021 through August 3, 2021. If you have any questions, please contact Stephanie Meyers at (303) 312-6938 or meyers.stephanie@epa.gov.

Sincerely,

**STEPHANIE
MEYERS**

Digitally signed by
STEPHANIE MEYERS
Date: 2022.02.08
08:11:49 -07'00'

Stephanie Meyers
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

1. Metal Container Corporation CSI Report
2. EPA Analytical Reports
3. Metal Container Corporation Analytical Reports

cc: Jon Wallace, Pretreatment Coordinator, CDPHE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202
Phone 800-227-8917
<http://www.epa.gov/region08>

NPDES Pretreatment Compliance Sampling Inspection (CSI) Report

Pretreatment ICIS Number: COPF00102

Facility Name and Address: Metal Container Corporation
1201 Metal Container Court
Windsor, CO 80550

Applicable Pretreatment Regulations: Coil Coating-Can Making Point Source Category,
40 CFR Part 465 (Pretreatment Standards for New
Sources at 40 CFR § 465.45)

General Pretreatment Regulations, 40 CFR Part
403

CSI date: August 2-3, 2021

Report Review		
Drafter Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8WP-CWW Denver, Colorado 80202	2/2/2022
	303-312-6938	
Reviewer Name	Address/Phone Number	Date
Al Garcia	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	12/26/2021
	303-312-6382	
Supervisor Signature/Name	Address/Phone Number	Date
MICHAEL BOEGLIN  Digitally signed by MICHAEL BOEGLIN Date: 2022.02.07 23:08:18 -07'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	2/7/2022
	Michael Boeglin 303-312-6250	

Section 1.0 – Objective

On August 2-3, 2021, a Pretreatment Compliance Sampling Inspection (CSI) was conducted at the Metal Container Corporation (facility) in Windsor, Colorado. The objective of the CSI was to monitor the facility's effluent, gather data independent of that which the facility provides EPA on Discharge Monitoring Reports (DMRs), and evaluate compliance with the requirements and limitations of the General Pretreatment Regulations under 40 CFR Part 403 and the Coil Coating Point Sources Category Subpart D – Canmaking Pretreatment Standards for Existing Sources under 40 CFR Part 465.44.

Section 2.0 – Participants

EPA:

- Al Garcia, Pretreatment Coordinator
- Lisa Kay Prideaux, NPDES ECAD
- Stephanie Meyers, NPDES ECAD
- Kristin Ratajczak, NPDES ECAD
- Trent Rainey, NEIC
- Kristine Anderson, NEIC

Metal Container Corporation:

- Tasha Greene, Environmental Health and Safety Manager
- Devin Bjorneboe, Quality Environmental Coordinator

Section 3.0 – Facility Description

Manufacturing Process

Metal Container Corporation is a manufacturer of aluminum beverage containers. The facility has an average daily production rate of 5.6 million cans per day. Cups are formed from aluminum coil, prior to undergoing drawing and ironing processes to form cans. Following trimming, the cans enter a large trench that conveys cans to two parallel can spray washing process lines with identical configurations and tanks. Cans are prewashed using a low-pressure spray prior entering a seven-stage cleaning process.

1. Sulfuric acid (H_2SO_4)
2. Hydrofluoric (HF) acid (30%) in solution with a H_2SO_4 surfactant cleaner
3. Rinse water spray
4. City rinse water
5. Deionized (DI) water
6. DI water containing a mobility enhancer
7. The washed cans are dried in a natural gas oven

Wastewater from the can-washing processes is conveyed to the onsite wastewater treatment system.

The washed cans are conveyed to the two printer lines. After the printer ink application, an over-
varnish is applied to the top and bottom of the cans to cure the coatings in an oven. A necker wax is applied on the top cut edge of the cans, which are then conveyed to the necker process line. The facility has two parallel necker process lines that each consists of ten stages to draw out the neck of the can and about 20,000 cans per minute are run through the necker process lines. The cans are the flanged and the base is reformed in the inside base profile reformer to add strength during the filling of the can. The printed cans undergo a quality assurance/quality control (QA/QC) process to identify defects and damage generated from the printing. No wastewater is generated from the printing or QA/QC process.

Non-regulated wastestreams include mop water, cooling tower blow down, and backwash and regeneration wastewater from an onsite DI water treatment system.

Wastewater Treatment Process

The facility's wastewater treatment system consists of six collection tanks, a four-stage reactor batch treatment system, and a clarifier. The facility has three process wastewater collection tanks (CE 1, CE 2, and CE 3), two oil collection tanks (Oil Split A and Split B), Used Oil Tank, and a Solids Waste tank.

The CE tanks act as wastewater collection and equalization. Tanks CE2 is the primary wastewater collection tank with CE1 used for overflow. CE3 tank is rarely used but can act as extra storage. The wastewater in the CE Tanks is sent to the three-baffled, four-stage reactor batch treatment tank. The stages of the reactor batch tank are as follows:

1. Acid Break Stage (H_2SO_4 , pH of 1.8) – acid added to crack/break the oil, contents are mixed
2. Oil Skimming stage with a rope mop – skimmed oil is collected in a pan and sent to the Oil Split A tank – waste oil treatment/management
3. Retention stage
4. Lime Addition Stage - pH of 8.8 to 9.0; solids precipitation, - the lime is stored in a lime storage tank.
5. Retention Stage, mixing and contact time.

The wastewater from the reactor batch tank is sent to the clarifier. Polymer stored in a 570-gallon day tank is metered into the clarifier to aid in solids formation/precipitation. The solids accumulate on the bottom and are collected in a sump that is pumped to a 13,000-gallon waste solids tank. The scum that accumulates on the top of the clarifier is raked, collected in a sump, and sent to the 1st stage of the reactor batch tank. A continuous pH monitoring meter is installed in the weir overflow to the effluent trough leading to the discharge pipe from the clarifier and to the POTW, this is identified as Outfall 001. The facility has installed an audible alarm that is triggered at a high pH set point of 9.4 and a low pH setpoint of 6.5. The wastewater treatment operator will manually shut off flow and investigate the cause of the high or low pH. The facility continuously measures flow at the clarifier outfall.

The solids in the Waste Solids tank are pumped to the 44-plate filter press. The filtrate from the filter press is sent back to the clarifier. The solids are pressed, collected, and hauled off site by Waste Management as non-hazardous landfill cover. Based on a review of records, the facility generates about a 20 cubic yard dumpster of sludge per week.

The skimmed oil from the Reactor Stage 2 and tramp or skimmed oil from the Schneider Oil Filter system are collected in Oil Split A tank. H_2SO_4 is added to the contents of the tank to a pH of 1.8 with an air sparge to crack the oil. The contents of the Oil Split A tank are allowed to quiesce for three to four hours to allow for oil separation. The tank is dewatered by using a sight glass to determine the oil/water fraction. The water fraction is pumped to the CE2 tank and the oily fraction is sent to the Oil Split B tank.

The Oil Split B tank is heated and provides further separation of the oil/water fraction. Oil Split tank B is dewatered using a similar process for Oil Split A; the water fraction is pumped to the CE2 tank and the oil fraction is sent to the waste oil tank. A final dewatering occurs in the waste oil tank; however, the water is sent to Oil Split A tank for reprocessing through the oil separation treatment. The contents of the waste oil are hauled offsite by Waste Management.

Applicable Pretreatment Regulations

The Pretreatment Regulations found in 40 CFR Part 403 impose Pretreatment Requirements on the facility and its process wastewater discharge to the POTW. These Pretreatment Requirements include monitoring, reporting, and notification requirements found in 40 CFR Sections 403.12, 403.16, and 403.17 and specialized definitions, monitoring requirements, and effluent limits specific to the Coil Coating-Can Making Point Source Category found in 40 CFR Part 465. The applicable effluent limits are listed in the Can Making pretreatment standards for new sources at 40 C.F.R. 465.45.

The Pretreatment Requirements apply at Outfall 001. The Outfall is defined as follows:

Outfall 001: The discharge pipe from the wastewater treatment clarifier conveys regulated wastewater to the POTW. The treated wastewater from the clarifier overflows over a weir into the effluent trough leading to the discharge pipe. A continuous pH monitoring meter is installed in the effluent trough directly next to the discharge pipe.

Section 4.0 – EPA Sampling Procedures

Metal Container Corporation discharged from the clarifier on a continuous basis during the sampling event.

The Coil Coating-Canmaking Pretreatment Standards found in 40 CFR 465 and the Pretreatment Standards for New Sources found in 40 CFR 465.45 establish the following regulated pollutants: Chromium (Cr), Copper (Cu), Zinc (Zn), Fluoride (F), Phosphorous (P), Manganese (Mn), and Total Toxic Organics (TTO).

Based on the continuous discharge from the facility's clarifier, EPA's sampling procedures consisted of taking a 24-hour time-proportional composite sample for metals (Cr, Cu, Zn, and Mn), Fluoride, and Phosphorous. An ISCO 6712 Sampler was used to obtain the time-proportional composite sample, programmed for a 90mL sample aliquot every 15 minutes. The ISCO Sampler was placed on an elevated walkway over the clarifier approximately six feet above the monitoring point, where a 10-foot hose was used to pull wastewater into a 10L glass container placed inside of the ISCO Sampler. The ISCO Sampler began collecting 90mL time-proportional samples every 15 minutes at 0945 on August 2, 2021 and was stopped at 1505 on August 3, 2021. A total of 96 time-

proportional samples were collected. The 10L glass container was mixed, and then poured into 250mL containers for Metals, Fluoride, and Phosphorous.

Samples for TTOs (volatile organics (VOA) and semi-volatile organics (SVOA)) were collected at 2-hour intervals. A 250mL glass container rinsed with deionized water was used to collect discharged wastewater directly from the effluent trough, and then was poured into four 40mL glass vials for VOAs as distinct grab samples. The same glass bottle was used to generate aliquots for the SVOA 1L amber glass bottle.

The following sample aliquots and grab samples were gathered during the sampling day:

- VOA grab samples in four 30mL vials per grab sampling event, grab samples collected at 0941, 1142, 1331, and 1538. The vials were verified to not contain air bubbles.
- SVOA aliquots collected at 0946, 1146, 1334, and 1541 and composited in a 1L amber glass container.
- Equipment blank gathered at 0845
- SVOA duplicate aliquots gathered at 0948, 1149, 1334, and 1541 and composited in a 1L amber glass container.
- Field blank grab sample gathered at 0933 for SVOA in a 1L amber glass container.
- VOA duplicate grab samples in four 40-mL vials per grab sampling event, grab samples gathered at 1146. The vials were verified to not contain air bubbles.
- VOA field blank grab sample gathered at 0930 in a single 40-mL vial. The vial was verified to not contain air bubbles.
- VOA trip blank grab sample gathered at 0930 in a single 40-mL vial. The vial was verified to not contain air bubbles.

Grab samples for pH were taken at 2-hour intervals and analysis was conducted within 15 minutes using a three-point calibrated field pH meter. The pH meter was calibrated with 4.01, 7.00 and 10.01 pH buffers before the sampling event on 8/2/2021 at 0901. The records for the pH calibration and pH verification checks are documented in the field notebook labeled 2021-0015. On the sampling day, pH grabs were collected at 0956, 1154, 1331, and 1543.

Section 5.0 – QA/QC and Data Assessment/Validation

In addition to the sampling event, the following sampling QA/QC samples were taken to ensure sampling quality and consistency.

- Sample duplicate of automatic ISCO sampling – the ISCO sampler container was well mixed and equal aliquots were collected in the sample bottle and the sample duplicate bottle. The sample bottle and sample duplicate bottle were preserved with HNO₃ for metal analyses.
- The pH meter (Thermo Scientific SN 2660) was calibrated with pH 4.01, 7.00 and 10.01 prior to the pH grab sampling event on 08/02/2021 at 0901. The results of the pH calibration are documented in the Metal Container Corporation field book labeled “2021-0015”. The pH at Outfall 001 was measured at 2-hour intervals as listed below.
 - 8.57 s.u. on 8/2/2021 at 0956
 - 8.57 s.u. on 8/2/2021 at 1154
 - 8.62 s.u. on 8/2/2021 at 1331

- 8.66 s.u. on 8/2/2021 at 1543
- Based on EPA's evaluation of the analytical results, the sampling project procedures are consistent with established field and laboratory QA/QC procedures to minimize and identify potential errors with field and laboratory activities. This includes consistency in the way data are collected in the field and laboratory, collecting and evaluation duplicate and blank samples, and decontamination procedures, as documented in Section A.7, step 6 of the Metal Container Corporation 2021 Pretreatment Significant Industrial User Quality Assurance Project Plan (QAPP).

Section 6.0 – Analytical Results

The analytical results from the sampling event conducted by EPA on August 2, 2021 are included in Tables 1, 2, and 3. The determination for compliance is noted in the compliance status column.

Table 1 - Sample Result for Metal Container Corporation - Outfall 001 – Daily Maximum - August 2, 2021 ⁽¹⁾

Pollutant	Daily Maximum	Sample Result	Compliance Status
	lbs/1,000,000 cans manufactured		
Chromium (Cr)	0.0617	ND	In Compliance
Copper (Cu)	0.267	ND	In Compliance
Zinc (Zn)	0.205	0.002	In Compliance
Fluoride (F)	8.345	0.981	In Compliance
Phosphorous (P)	2.342	0.007	In Compliance
Manganese (Mn) ⁽²⁾	0.095	--	Not Evaluated
Total Toxic Organics (TTO)	0.045	ND	In Compliance

⁽¹⁾ The field sample IDs = 102-08022021-001-1, 102-08022021-001-2, 102-08022021-001-3, 102-08022021-001-4, 102-08022021-001-5, 102-08022021-001-6, 102-08022021-001-7, 102-08022021-001-8, 102-08022021-001-9, 102-08022021-001-10, 102-08032021-001-1, 102-08032021-001-2

⁽²⁾ No data reported by lab, therefore the sample result could not be calculated nor evaluated for compliance.

Table 2 - Sample Result for Metal Container Corporation - Outfall 001 – Monthly Average - August 2021⁽¹⁾⁽²⁾

Pollutant	Monthly Average	Sample Result	Compliance Status
	lbs/1,000,000 cans manufactured		
Chromium (Cr)	0.025	ND	In Compliance
Copper (Cu)	0.140	ND	In Compliance
Zinc (Zn)	0.086	0.002	In Compliance
Fluoride (F)	3.702	0.954	In Compliance
Phosphorous (P)	0.958	0.007	In Compliance
Manganese (Mn) ⁽³⁾	0.041	0.016	In Compliance
Total Toxic Organics (TTO)	0.0210	ND	In Compliance

⁽¹⁾ The field sample IDs = 102-08022021-001-1, 102-08022021-001-2, 102-08022021-001-3, 102-08022021-001-4, 102-08022021-001-5, 102-08022021-001-6, 102-08022021-001-7, 102-08022021-001-8, 102-08022021-001-9, 102-08022021-001-10, 102-08032021-001-1, 102-0032021-001-2

⁽²⁾ Results from Metal Container Corporation's sampling event on August 3, 2021 were used in addition to EPA's results to calculate the monthly average for August 2021.

⁽³⁾ No data was reported by EPA's lab, therefore only Metal Container Corporation's results were used for the monthly average.

Table 3 - Sample Result for Metal Container Corporation - Outfall 001 – pH - August 2, 2021

Pollutant	Daily Maximum	Sample Result				Compliance Status
pH	≥5.0	8.57 s.u. at 0956	8.57 s.u. at 1154	8.62 s.u. at 1331	8.66 s.u. at 1543	In Compliance

Section 7.0 – Observations and Findings

1. Based on the analytical data generated from the compliance sampling inspection event on August 2-3, 2021, Metal Container Corporation was in compliance with the Pretreatment Standards for New Sources.