



Industrial User Facility Inspection Report U.S. EPA, Region 8

Name of industry and location:

FGM Parallel LLC (formerly Static Coatings)
2750 South Raritan Street
Englewood, CO 80110

Control Authority / NPDES Permit No.

South Platte Renew (SPR)
NPDES Permit No. CO-0032999

IU – NPDES ID

COPIU002A

Date of visit:

June 25, 2025

Approximate Time of visit:

0900 - 1020

Name(s) / Affiliation / email of inspector(s):U.S. EPA:

Al Garcia, garcia.al@epa.gov

SPR:

- Maureen Mulcahy mmulcahy@englewoodco.gov
- Jon Bridges jbridges@englewoodco.gov
- Heather Hurtado hhurtado@englewoodco.gov
- Emma Hebert ehbert@englewoodco.gov

General Facility Information:Representatives at Inspection:

- Patrick Dunlap – Operations Manager, pdunlap@parellelap.com
- Trampus Rowan – Wastewater Manager, trowan@parellelap.com
- Tim Grossbach, consultant, 403 Compliance LLC <mailto:Hollmann.mattew@dystar.com>

Type of Business Operations:

- Manufacturer of architectural products, paint preparation and powder coating

Facility Information:

- 22 employees
- four days/week, (Monday through Thursday).
 - one Shift (6 a.m. to 4:30 p.m.)
 - Friday about once per quarter for cleaning and maintenance

Inspection Description:

Al Garcia from the U.S. Environmental Protection Agency (EPA) and Maureen Mulcahy, Jon Bridges, Heather Hurtado, and Emma Hebert from SPR conducted a significant industrial user (SIU) inspection of the Static Coatings facility (facility) located at 2750 South Raritan Street, Englewood, CO 80110. The SIU inspection was conducted as part of the EPA Pretreatment Audit of the SPR's Publicly Owned Treatment Works (POTW) and EPA-approved Pretreatment Program. The inspection of the facility provides current conditions of the facility's unit operations and consisted of an evaluation of the waste streams generated from the unit operations,

management of these waste streams, including potential for spills and slug discharges. The facility discharges process wastewater from the paint preparation operations to the sewer collection system leading to the SPR's POTW.

Upon arriving at the facility on June 25, 2025, at approximately 0900, Al Garcia of the EPA presented credentials to the facility representatives and explained the purpose of the inspection. During the opening interview, the facility representatives provided an overview of the operations and processes at the facility, waste streams generated, and the management/discharge of these waste streams. The opening interview was followed by a facility tour to visually inspect the unit operations. The EPA conducted a closing conference to discuss potential findings and recommendations identified during the inspection.

Process Description:

The facility, located at 2750 South Raritan, Englewood, CO 80110, manufactures architectural cladding/siding products for the construction/building sector. The facility has 22 employees and operates one day shift from Monday through Thursday. The facility occasionally operates on about one Friday per quarter for cleaning and maintenance. The Google Maps view of the facility is shown in Figure 1.



Figure 1 – FGM Parallel LLC (formerly Static Coatings) - Google Maps View

Chemical and Raw Materials Storage –

The facility receives raw materials and chemicals into its warehouse located on the southeast corner of the building. The Al-1633 alloy raw material is staged in the receiving area and the chemicals are stored in secondary containment in a storage location or on the process floor, next to the process tanks.

- Deox 138 (aluminum cleaner/etch) – four 55-gallon drums
- Advantek 1469 Sealer – four 55-gallon drums
- Waste Treatment Chemicals:
 - Sulfuric Acid – 300-gallon tote
 - Hydrochloric Acid – 300-gallon tote

Based on observations during the facility tour, it does not appear that the facility has any floor drains in the warehouse storage/receiving/handling areas and the potential for spills is minimal.

The Al raw material is milled or pressed into one of the thirty-five profiles manufactured at the facility. The Al parts are loaded onto racks mounted on a conveyor that runs the parts through the production lines. The conveyor transports the parts to the 6-stage parts washer line, composed of the following tanks.

1. Tank #1 – Deox 6% solution – 1,585-gallons tank; the chemistry is pumped to fixed nozzles within the stage to spray onto the parts as they move through the stage and to provide cleaning and etching. The chemistry that drains off the part are contained in the tank below the parts. The chemistry is changed out every two to three months, when spent. The facility opens a valve located behind the stage to transfer the spent chemicals to pit #1 storage tank in waste treatment.
2. Tank #2 – Deox 6% solution – 1,585-gallons tank; the chemistry is pumped to mechanical oscillating nozzles within the stage to spray onto the parts as they move through the stage and to provide cleaning and etching. The chemistry that drains off the part are contained in the tank below the parts. The chemistry is changed out every two to three months, when spent. The facility opens a valve located behind the stage to transfer the spent chemicals to pit #1 storage tank in waste treatment.
3. Tank #3 – City water rinse sprayed onto the parts through mechanical oscillating nozzles. The rinsewater continuously flows to pit #2 storage tank in waste treatment.
4. Tank #4 – Demineralized water sprayed onto the parts through mechanical oscillating nozzles. The rinsewater continuously flows to pit #2 in waste treatment.
5. Tank #5 – Advantech Sealant – 1,585-gallons tank; the chemistry is pumped to mechanical oscillating nozzles within the stage to spray onto the parts as they move through the stage to provide sealing, prior to powder coating. The chemistry that drains off the part are contained in the tank below the parts. The chemistry is changed out every two to three months, when spent. The facility opens a valve located behind the stage to transfer the spent chemicals to pit #2 storage tank in waste treatment.

The cleaned and sealed parts are conveyed to a 3-stage dryer, to a staging area and to the powder booth. The powder booth has 12 powder coat spray guns with 6 spray nozzles on each side of the booth. According to Mr. Rowan, the powder booth and paint nozzles are blown down during paint color changes by pneumatically blowing air through nozzles and using vacuum control to shake out and collect the waste paint powder. The facility generates about 40 lbs of waste powder paint per week. The collected powder is put into the dryer to bake out liquid and disposed in the domestic trash.

The powder-coated parts are sent through an oven and are unloaded off the rack and either packaged and shipped, or sent to the sublimation process. The parts that are sent to be sublimated are fed into a conveyor line where they are bagged and vacuum sealed to apply the ink material onto the part. The part is sent through an oven at 400° F to vaporize and bake the ink onto the part. The parts are inspected and then sent to packaging and shipping.

The facility has a reverse-osmosis (RO) system to polish city water to process specifications. The RO is a three-membrane system to initially treat the water. The treated water is then put through a carbon filter and then sent to the RO recycle (700-gallons) and storage tanks (each 1,100-gallon). According to Mr. Rowan, the RO membranes are not backwashed but are replaced when spent. The carbon filter is backwashed about 1/month and generates about 100 gallons.

Wastewater Management –

The regulated process wastewaters generated from the 6-stage etch/clean process line are treated through the facility's wastewater treatment system. As mentioned previously, the concentrated chemical baths (tanks 1, 2 and 5) are transferred to pit #1 through manually turning a discharge valve for each tank. The rinsewater tanks 3 and 4 are sent to pit #2. Each "pit" is an above-ground 2,200-gallon storage holding tank. The rinsewaters in Pit #2 are sent to the 750-gallon neutralization tank for adjustment to pH 7 to 8. The chemical baths in pit #2 are dosed or metered into the neutralization tank, depending on pH controls. The wastewater then is pumped to the 750-gallon flocculation tank where polymer is added to aid in flocculation. The flocculated wastewater is

pumped to the 1,700-gallon cone-bottom decant tank for clarification and solids settling. The solids are pumped from the bottom of the decant tank to the 1,800-gallon sludge thickener tank and then to the filter press. Solids are pressed and collected about 3 hours/day. The filtrate is returned to the flocculation tank and the solids are disposed in the domestic trash.

The decant effluent is sent through a sand filter and to a 739-gallon final holding tank, the contents are pH monitored and batch discharged depending on the pH. According to Mr. Rowan, the batch discharges last about 20 minutes per discharge and the facility discharges about 3,000 gallons maximum/day. Floor washdown is conducted about every 6 months.

EPA Classification of the Industrial User

Based on observations and information received during the inspection, the facility is categorized as an industrial user that generates wastewater subject to the Metal Finishing Categorical Pretreatment Standards for New Sources found in 40 C.F.R §433.17 and the standards and conditions found in Title 12, Chapter 2, Division 5 of the City of Englewood Pretreatment Ordinance.

Summary of Findings

FGM Parallel LLC (formerly Static Coatings)

NPDES ID# COPIU002A

June 25, 2025

Pretreatment Inspection Findings	Follow up Action Items
1. The Pretreatment Regulations at 40 C.F.R. § 403.8(f)(2)(vi) require the facility to “control slug discharges defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. If slug discharge control is necessary, a slug discharge control plan is required to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency.” Based on observations from the facility inspection, a potential for slug discharge exists with the manual discharge valves located behind each chemical tanks on the etch/clean process line (tanks 1, 2, and 5). The discharge valve can be turned manually, but there appears to be minimal control to minimize/eliminate operator error. A slug discharge control plan is developed, but it does not provide for such controls to address potential operator error.	<u>Pretreatment Requirements</u> 40 C.F.R. § 403.8(f)(2)(vi) 40 CFR 403.8(f)(2)(vi)(D) <u>Corrective Action Item</u> The EPA recommends the facility evaluate the control of the manual discharge valves for each chemical bath on the clean/etch process line and install physical control such as lock out to ensure only qualified personnel can discharge the spent chemicals to waste treatment. If the EPA’s recommendation is enacted, then the current slug discharge control needs to be modified to address the new controls on the manual discharge valves.

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
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Reviewer Name	Address/Phone Number	Date
Lisa-kay Prideaux	U.S. EPA Region 8 10 W 15 th Street 8ECA-W-NW Helena, Montana 59626 406-457-5022	06/30/2025
Supervisor Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202	07/08/2025
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