

# REPORT OF COMPLIANCE EVALUATION INSPECTION (INDUSTRIAL STORMWATER)

**Superior Industries**  
3330 East 23rd Street  
Columbus, Nebraska 68601

Authorization Number: **ISW-202200322**

BY  
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 7  
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)  
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON  
**July 30 and August 2, 2024**

## **Introduction**

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on July 30 and August 2, 2024, at the Superior Industries Columbus Plant in Columbus, Nebraska. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection. Jason Windhorst with the Nebraska Department of Environment and Energy was present during the inspection.

## **Participants**

### **Superior Industries- Columbus**

- Jessica Leffers, Safety & HR Manager [jessica.leffers@superior-ind.com](mailto:jessica.leffers@superior-ind.com)

### **Nebraska Department of Environment and Energy-NPDES Compliance Section**

- Jason Windhorst, Environmental Specialist, QCIS, QPSWPP [jason.windhorst@nebraska.gov](mailto:jason.windhorst@nebraska.gov)

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

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS [Ahmad.Naji@epa.gov](mailto:Ahmad.Naji@epa.gov)

## **Inspection Procedures**

Mr. Jason Windhorst and I arrived at the Superior Industries facility in Columbus, Nebraska, on July 30, 2024, at 2:00 PM. We met with Ms. Jessica Leffers. We introduced ourselves and I presented my credentials. I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet (Attachment 1) and the U.S. EPA Confidentiality Notice, evaluating self-monitoring and stormwater management practices, and conducting a facility walk-through with photographs (**Attachment 4**).

I provided Ms. Leffers with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice (CBI). The facility chose not to claim any confidential business information (**Attachment 6**).

Ms. Leffers indicated that the facility had a Stormwater Pollution Prevention Plan (SWPPP) (Attachment 3) and had a National Pollutant Discharge Elimination System (NPDES) General Permit from the Nebraska Department of Environmental and Energy (NDEE) until April 21, 2022, when they received a No Exposure Certificate from NDEE (Attachment 2).

After a brief description of the site operations and stormwater management of the site, Ms. Leffers escorted Mr. Windhorst and I on a visual inspection of the site.

We started our visual inspection by looking at the hazardous and non-hazardous waste storage building on the east side of the property. We looked at the Stormwater Retention Pond (SWRP) located at the northeast corner of the site, we looked at a stormwater inlet (photos 3 and 4), we looked at the uncoated raw and scrap steel stored on racks and in metal boxes around the perimeter of the production building and in the north storage yard (photo 5), we looked at an open dumpster containing process metal coated with oil residue, and finally we looked at the west ditch (photos 6 & 7).

After the site walkthrough, we held an exit meeting with Ms. Leffers. I discussed the preliminary observations, and I informed Ms. Leffers that I will issue a Notice of Preliminary Findings (NOPF) and return on August 2, 2024, to conduct a formal exit meeting.

On July 31, 2024, I received an email from Ms. Leffers that included a SWPPP, a SWPPP map, and the signed CBI Form.

On August 2, 2024, I returned to the site and held a formal exit meeting with Ms. Leffers. I discussed the two observations I included on the NOPF (**Attachment 5**). I informed Ms. Leffers that I will communicate all other matters with her upon my further review of the submitted records upon my return to the office. Ms. Leffers mentioned that she had plans to take a vacation the following week and asked if I can grant her extra time beyond the 10 days to formally respond to the NOPF. I asked Ms. Leffers to send me an email with her request.

On August 12, 2024, I received an email from Ms. Leffers asking for an extension to formally respond to the NOPF. Ms. Leffers also mentioned that Superior completed corrective action of the first finding (cleaning activities taking place), and she reached out to NDEE to work on obtaining a permit. I approved Ms. Leffers extension request.

On August 19, 2024, I receive an email from Ms. Leffers that included Superiors Industries formal response (Attachment 7) to the August 2, 2024, NOPF.

### **Facility Description**

According to Ms. Leffers, the current owner started operations at the site in 2014, which consist of machining, fabrication, welding, and painting of steel for manufacturing heavy machinery and equipment used by the mining and aggregate industries.

The property consists of approximately 9.78 acres including a large building hosting a manufacturing area and offices, hazardous and non-hazardous waste building, a raw material and product storage area on the north side, and an employee parking lot on the south side of the property.

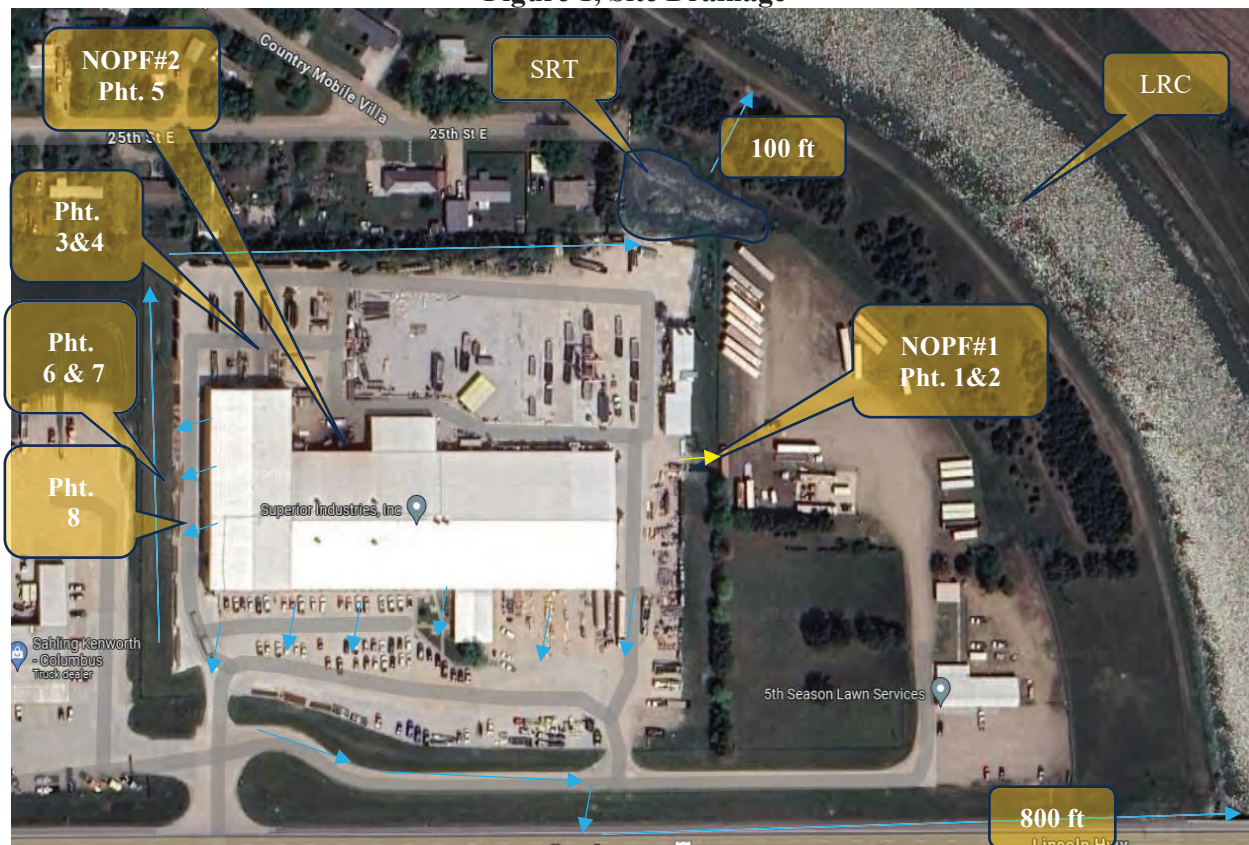
The majority of manufacturing takes place indoors. However, parking and washing of mobile equipment such as pickups, forklifts, trucks, trailers, etc. is conducted outdoors. Uncoated raw and scrap steel are stored on racks and in boxes around the perimeter of the production buildings and at the north storage yard. An uncovered industrial dumpster containing scrap metal covered with oil residue is also exposed to the elements. A dust collector system collecting sheet blaster particulates is also located outside. In addition, an above ground diesel fuel storage tank is also located outside.

Such outdoor practices can cause the exposure of fluids such as engine oil leaking onto concrete or the ground, can cause rust and coating of cutting oil, and particulates to runoff the property as a sheen.

### **Site Drainage Patterns**

The site is located east of the Loup River Canal (LRC). Stormwater runoff from the north storage yard north of the production building is directed to travel north and northeast into the Stormwater Retention Pond (SWRP). Overflow from the SWRP would flow east approximately 100 feet onto the steep sloped bank of the canal into the LRC.

**Figure 1, Site Drainage**



Stormwater on the west side of the property and roof drain would flow west into a stormwater ditch. Stormwater in the ditch would flow north into a culvert pipe then continue east in the ditch until it reaches the SWRP.

Stormwater runoff from the south side of the property (employee parking lot) would flow south towards the road ditch which is part of the Columbus Municipal Separate Storm Sewer System (MS4). Stormwater in the ditch would flow east approximately 800 feet into the LRC.

### **Findings and Observations**

All findings and observations of this inspection concern Superior's status of compliance with stormwater management requirements. These findings are based on my interview with Ms. Leffers, my review of the SWPPP, and my visual observations of the site. All observations were discussed in detail with Ms. Leffers throughout the inspection and during the formal exit meeting on August 2, 2024. All photos taken during the inspection on July 30, 2024, are included as Attachment 4 to this report.

1. At the time of the inspection, I observed non stormwater discharging from the east side of the site at the south side of the hazardous material storage building. We observed site personnel using a pressure washer washing off water containing a black substance and directing the flow to the east where it left the site (41.43989164019069, -97.28500116661768) (photos 1 and 2). Ms. Leffers indicated that the water is from washing equipment and machinery and that this practice rarely occurs. I informed Ms. Leffers that this practice is an unauthorized discharge. In addition, I explained that the No Exposure Certificate (NEC) prohibits cleaning industrial machinery or equipment outside. Therefore, I issued a Notice of Preliminary Findings (NOPF#1) because cleaning industrial machinery was taking place at the time of the inspection and was causing contaminated water to leave the site from the east (unauthorized discharge).

**Photo 2, Site personnel washing polluted water off site.**



2. Ms. Leffers provided me with a stormwater pollution prevention (SWPPP) that the facility implemented prior to receiving the No Exposure Certificate on April 21, 2022. But there were no records indicating the SWPPP was being implemented.
3. I issued NOPF#2, because the facility had raw and scrap steel stored outdoors and had waste material with oil residue stored in an open container that has drainage holes and was exposed to stormwater.
4. Structural and nonstructural controls on site were the SWRP, and the ditch leading to the SWRP.

### **Conclusion and recommendations**

Superior was discharging (unauthorized discharge) process wastewater from the east side of the site without obtaining a permit as required by the CWA-NPDES and Nebraska §81-1506 (2)(a).

The No Exposure Certificate prohibits using, storing, or cleaning of industrial machinery or equipment in areas exposed to stormwater. It also prohibits uncoated raw and scrap steel that can cause rust and coating of cutting oil to be exposed to stormwater.

Superior Industries should contact the Nebraska Department of Environment and Energy to obtain the General Permit or operate the facility to eliminate exposure of industrial activities to stormwater.

**NAJI AHMAD** Digitally signed by NAJI AHMAD  
Date: 2024.08.26 09:06:32 -05'00'

Naji J. Ahmad  
Environmental Engineer, WB/DWIS

**NICOLE MORAN** Digitally signed by  
NICOLE MORAN  
Date: 2024.08.27  
12:19:52 -05'00'

Nicole Moran  
Section Supervisor, WB/DWIS

### **Attachments:**

1. R7 SW Checklist
2. NOI & NEC
3. 2019 SWPPP
4. Photo Log
5. NOPF
6. CBI Form
7. Response to NOPF