

REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

**AT
TITAN TRAILER MANUFACTURING, PLANT #1
HWY. 77 SOUTH,
WATERVILLE, KANSAS 66548
KANSAS PRETREATMENT PERMIT: KSP000068**

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

**Enforcement and Compliance Assurance Division
August 3, 2023**

INTRODUCTION

I conducted an Industrial User Compliance Sampling Inspection at the Titan Trailer Manufacturing Plant #1 facility located in Waterville, Kansas, on August 3, 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

Titan Manufacturing Inc:

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FACILITY DESCRIPTION

The Titan Trailer Plant #1 facility in Waterville manufactures steel livestock, flatbed, cargo, and other trailers. The facility performs fabrication, welding, and assembly on galvanized sheet metal and regular steel components. The facility has approximately 70 employees and operates one shift, five days per week.

Regulated wastewater processes include metal cleaning and paint preparation using a mild detergent and a monosodium phosphate cleaner. Safety Data Sheets were obtained during the inspection and were placed in the ECAD electronic file system after they were reviewed. The wash operations are performed in a wash bay with a hand sprayer (Photo 1). Wastewater from the wash bay is collected in

a sump at the back of the wash bay then pumped to a pretreatment system. The location of the wash bay and pretreatment system are shown in a diagram as a part of the NPDES Permit (attachment 2).

The pretreatment system has two 1,500-gallon storage tanks where the wastewater is stored, and pH adjusted. Additional treatment is performed using a Ringwood CE-400 Automatic Wastewater Treatment System in which Bentonite is mixed with the wastewater in a mixing tank and then passed through a cloth-like filter to remove solids. The Bentonite solids are then pressed in a sludge press and both the solids and the filter are conveyed to and stored in a dumpster at the front to the CE-400 (photos 6-7). The solids are then disposed of in a landfill as a special waste. A copy of the last waste manifest for the sludge disposal was obtained during the inspection and then placed in the ECAD electronic file system.

Wastewater passes through the filter into a storage tank at the base of the CE-400. From the storage tank it is routinely discharged to the City's collection system through a fire hose leading to outfall 001 at a floor drain which is just west of the wastewater storage tanks (photo 8). According to Mr. Stadel, prior to discharge, the wastewater's pH is tested. If it does not meet discharge limits (5.0 -10.0 s.u.), the fire hose can be uncoupled from outfall 001 and the wastewater drained back to the sump in the wash bay for retreatment using an open drainpipe at the outfall 001 floor drain (photo 8). A Water and Wastewater Flow Chart provided by Mr. Stadel is provided as attachment 3.

INSPECTION PROCEDURES

I arrived at the facility unannounced at 10:00 a.m. on August 3, 2023, presented my credentials to Mr. Stadel and Ms. Carlsen, explained the purpose and procedures of the inspection. I also stated that during the inspection, I would collect samples of the facility's process wastewater that is discharged to the city of Waterville. Nine photos were taken during the inspection (attachment 1). I completed the Region 7 Industrial User inspection checklist after the completion of the inspection (attachment 4).

SAMPLING PROCEDURES:

On August 3, 2023, I collected a grab sample from the uncoupled firehose that leads to Outfall 001 from the three pits that collect process wastewater from the Shop 10 area (Outfall 001). The sample was collected into a clean container for analysis of metals, preserved as appropriate, cooled with ice to maintain 4 degrees Celsius. The temperature and pH analyses were performed immediately on site.

All samples collected were transported to the EPA Region 7 Laboratory. Chain-of-custody procedures were used for all samples. 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 was issued to Titan Trailers Inc. on September 1, 2019 and expires on November 30, 2023 (attachment 2). The permit requires the facility to monitor its effluent for flow, pH, Total Toxic Organics (TTO), metals, and Cyanide. The permit also places numerical limitations on those parameters and requires pH and flow to be measured daily when discharging. The other parameters must be sampled and analyzed on a quarterly basis. The facility must submit

discharge monitoring reports (DMRs) to the Kansas Department of Health and Environment on a semi-annual basis (January 28 and July 28 of each year). The facility is to submit a TTO Certification Statement with the DMR if no TTOs are used during that monitoring period.

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status from 2020 – 2022, which were provided in the Excel spread sheet by the facility. After the review, I placed the spreadsheets in the ECAD electronic file system. I found no exceedances of the effluent limits during the review.

3. Water Balance: I received copies of the facility's monthly use data for June 2022 through July 2023 (13 months) and used it to calculate that the facility is using approximately 3,400 gallons of water per workday. I compared this to the estimated total daily discharge for both process wastewater (1,200 gpd) and sanitary use (1,050 gpd) (2,250 gpd total) and found that water balance was not achieved. The monthly water use data was placed in the ECAD electronic file system after review.

5. Total Toxic Organics: The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics (TTO) provided it is following the provisions of its approved Solvent Management Plan. Mr. Stadel provided a copy of the Solvent Management Plan after the completion of the inspection. I reviewed the Solvent Management Plan, then placed the plan into the ECAD electronic file system.

6. Sample Results: Analytical results for samples collected during the inspection are presented in the table below. The complete data transmittal package is included as attachment 5.

Sample Results For Titan Trailer Plant #1, 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	0.26	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
1	ND		ND		0.0449		0.267		Not Sampled		ND		ND		13.1		8.84	
Result:	C		C		C		C		NA		C		C		V		C	

Results of the sampling indicate that the facility violated the daily limit for Zinc.

8. Other Observations: During the inspection, I observed areas on the outside of the building that contained raw and spent material that would be exposed to stormwater during precipitation events (photos 8-9). During the inspection, I asked if the facility has a current industrial stormwater permit or Stormwater Pollution Prevention Plan (SWPPP). Mr. Stadel provided a SWPPP which I reviewed and noted that it was last updated in 2018. I also found a no-exposure certification from 2020 (attachment 6). He also provided a copy of a termination request to KDHE to terminate the industrial stormwater permit (attachment 6). After the conclusion of the inspection, I contacted KDHE and was provided information including that KDHE requires that a no-exposure certification must be re-certified every year and that the Titan Trailer permit was terminated in 2020 (attachment 6). Titan Trailer provided their Standard Industrial Classification (3715) during the inspection. According to Chapter 40 of the Code of Federal Regulations Part 122.6 (b) (14), the industrial activity conducted at the Titan Trailer facility is required to seek coverage for any and all industrial stormwater discharges or apply for a no-exposure exemption.

SUMMARY

- Samples taken during the inspection indicated that the facility violated the daily limit of Zinc during the inspection.
- The facility must apply for a general permit for industrial stormwater or apply for a no-exposure exemption.

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Attachments:

1. Photos and Photo Log (11 pages)
2. Kansas Pretreatment Permit (15 pages)
3. Flow Diagram (1 page)
4. Region 7 Industrial User Inspection Checklist (6 pages)
5. Data Transmittal Packet for Activity JAH2315 (13 pages)
6. KDHE Stormwater Information (6 pages)