

REPORT OF INDUSTRIAL STORM WATER COMPLIANCE EVALUATION INSPECTION (CEI)

At

Alltrista Plastics, LLC
2600 N Partnership Rd
Springfield, Missouri 65803
State Permit No.: MOR23D115

On
December 12, 2022

By
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

INTRODUCTION

An Industrial Storm Water inspection was performed at Alltrista Plastics, LLC in Springfield, Missouri on December 12, 2022. This inspection was performed pursuant to Section 308(a) of the Clean Water Act as amended. This narrative report and attachments present the findings and observations made during the Industrial Storm Water CEI.

PARTICIPANTS

Alltrista Plastics:

Terry Ables, Operations Manager, 417-873-2104, terry.ables@alltrista.com
Dan Arview, Maintenance Manager, 417-873-2110

Missouri Department of Natural Resources:

Madeline Behlke-Entwisle, Environmental Specialist, 417-891-4300, Madeline.Behlke-Entwisle@dnr.mo.gov

U.S. Environmental Protection Agency (EPA):

Brian D'Alfonso, Biologist, 913-551-5095, dalfonso.brian@epa.gov

INSPECTION PROCEDURES

I arrived at Alltrista Plastics and presented myself at the facility office at approximately 11:30 am on December 12, 2022. I stated that I needed to conduct a storm water inspection of the facility. I met with Mr. Ables and Mr. Arview, presented my credentials, and explained the scope and purpose of the inspection. I informed them that I would be performing a complete Industrial Storm Water inspection under the authority of Section 308(a) of the Federal Water Pollution Control Act to evaluate the facility's compliance status with the requirements of the Clean Water Act and with the National Pollution Discharge Elimination System (NPDES) permit, which was

issued by the Missouri Department of Natural Resources (MDNR). I explained that the inspection would consist of a review of required records, review of the Storm Water Pollution Prevention Plan (SWPPP) and a visual inspection of the facility. I stated that I would document my findings and observations by making photocopies, taking photographs and/or videos, and obtaining statements from facility staff. During that time, Mr. Ables explained that the facility is between Environmental Health and Safety (EHS) Managers. I asked how long the facility has been without an EHS manager and he stated about six months. He then stated that he thought the facility was about to hire one but were waiting on the candidate to accept the position. Mr. Ables explained that he and Mr. Arview were running the EHS program in the meantime. Due to this, Mr. Ables was unable to locate the facility's stormwater records at the time of inspection. This was noted as item #1 on the Notice of Preliminary Findings (NOPF) that was left on-site after the inspection.

Prior to entering the facility, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the public roads such as discharges, drainage patterns, flow directions, distance and direction of nearest perennial waters, visual condition of perennial waters, facility location, and layout.

After the inspection, I summarized the findings and recommendations of the visual inspection with Mr. Ables during the exit meeting of the inspection and left a NOPF on-site. See attachment 2 for the digital photographs and photo log. See attachment 3 for the facility layout.

I conducted this inspection in accordance with the procedures described herein and followed all applicable EPA Region 7 Standard Operating Procedures.

FACILITY DESCRIPTION

Facility Operations

The facility produces various customer goods through a plastic injection molding process, producing around two million parts each year. The facility encompasses approximately 10-15 acres of property and is located approximately one-half mile south of Interstate 44 and one mile east of US Highway 65 in Springfield, Missouri. The facility was built in 1995, is approximately 60,000 square feet, employs approximately 110 people and operates 24 hours per day, seven days a week.

The facility has a "back lot" that is used for storage and loading/unloading (photos 6, 7 & 9). The facility stores waste mop water totes, empty 55-gallon barrels, used pallets and trash dumpsters/roll-offs. There are multiple storage containers and one small storage shed on the back lot that are used to store process materials and equipment (photo 7).

The facility's main feedstock is plastic resin, which is delivered by common carrier trucks and railcars. The facility has a rail spur on the north side that runs adjacent to eight silos where plastic resin is stored (photos 1 & 4). Near the furthest west silo is a 500-gallon tank used for collection of spills from inside the facility (photo 3). Along the north side of the building, the facility has multiple air compressor condensation drain lines (photos 2 & 5). There is also one four-inch pipe coming out of the building that Mr. Ables explained was an emergency blow-off for the facility's cooling system. Mr. Ables explained that if there was an over-pressurization of

the cooling system, freon would be released from this pipe. Mr. Ables stated that there has never been a release that he knows of.

Stormwater from the north side of the facility, including the silo area, generally flows east, either to a stormwater inlet in the northeast corner of the back lot, or to a timbered area north of the rail spur. The area around the silos all runs to the stormwater inlet on the northeast corner of the backlot. Stormwater from the back lot generally flows to the northeast corner stormwater inlet or to a stormwater inlet on the south end of the back lot (photo 8). The far east portion of the property generally flows to the north through a grassed area and leaves the property. The facility's parking lot on the south side of the property generally flows to the northeast to a stormwater inlet on the northeast of the parking lot (photos 12 & 13) or to stormwater inlets along the parking lot entrance (photo 14). All of the stormwater inlets on the property appear to be connected to the city's municipal separate storm sewer system (MS4), but this was not clarified during the inspection and is not described in the facility's SWPPP. All of the facility's outfalls flow to a tributary to Mill Creek.

The facility's best management practices (BMPs) include stormwater inlets, stormwater filtration devices, clean rubble, grass berms and grass buffers.

Regulatory History

Alltrista Plastics, LLC is covered under MDNR's General Permit for stormwater discharges associated with plastics and rubber manufacturing, molding and recycling. The permit was issued on June 1, 2022 and expires May 9, 2027 (attachment 4). According to ECHO (Enforcement and Compliance History Online), the facility was last inspected by MDNR on June 20, 2019, and no violations were cited (attachment 5).

FINDINGS AND OBSERVATIONS

An Industrial Storm Water inspection to determine whether Alltrista Plastics, LLC is in compliance with their NPDES General Permit was conducted on December 12, 2022. The following findings were noted during the plant and record review. A summary is given in the NPDES Industrial Storm Water Worksheet (Industrial) as attachment 1. The weather conditions at the time of the inspection were overcast and dry. According to Weather Underground, Springfield, MO had approximately 1 inch of precipitation on December 10, 2022. On the day of inspection, all paved surfaces were dry.

Storm Water Pollution Prevention Plan (SWPPP)

The facility's NPDES Permit requires that the facility have a SWPPP (attachment 6). Mr. Ables was unable to produce a copy of the facility's SWPPP at the time of inspection. Mr. Ables emailed me a copy of the SWPPP, dated April 25, 2022, shortly after the inspection.

At the time of inspection, the facility was unable to produce records that are required by the general permit. This was noted as item #1 on the NOPF left on-site. Along with the SWPPP, I requested the facility to submit three years of inspections, annual SWPPP reviews, training records and sample records. After reviewing the facility's SWPPP, it was determined the facility

was not required to sample, so no sampling records were available. Of the remaining records, Mr. Ables only submitted training records for 2022. This is noted in the summary as item #3.

The facility SWPPP is required to include a detailed site map or maps that include all information required in the permit. The facility site map that was submitted with the SWPPP (attachment 7) did not include most of the required information that is listed in the Stormwater Requirements, section 6(d) of the permit. The map did include stormwater flow directions, but the flow directions on the map do not appear to be correct in all areas of the facility property, and do not include where the stormwater inlets discharge. This is noted as item #4 in the summary of this report.

The training records that Mr. Ables provided me included a log for facility personnel that were trained (attachment 8). The training log did not include Mr. Ables or Mr. Arview, who were managing the facility's stormwater program at the time of inspection according to Mr. Ables. The training logs also did not include the facility's previous EHS Manager, Stephen Bax, as having received stormwater training, only as providing the training. This is noted as Item #5 in the summary of this report. The permit and SWPPP require that the facility train personnel involved with stormwater management.

The facility's SWPPP does not include all the potential pollutants that I observed during my inspection, as required by the Stormwater Requirements section 6(a) of the permit. Specific instances of this include freon from a cooling system release, waste mop water stored in the back lot, and residue from empty drums stored in the back lot. This is noted as item #6 in the summary of this report.

While reviewing the SWPPP, I also found that Mr. Ables and Mr. Arview were not listed in the plan as members of the Stormwater Pollution Prevention Team as required by the Stormwater Requirements section 6(f) of the permit. According to Mr. Ables, he and Mr. Arview were maintaining the facility stormwater program at the time of inspection. This is noted as item #7 in the summary of this report.

The NPDES permit Stormwater Requirements section 6(g) and SWPPP also require that the facility conduct monthly facility inspections and quarterly visual stormwater inspections. Mr. Ables did not provide any record of the facility conducting any of these inspections. This is noted as item #8 in the summary of this report.

Stormwater Requirements section 6 of the facility's permit requires that they conduct reviews of the SWPPP and correct site condition changes. Even though the SWPPP has a revision date of April 25, 2022 (approximately 8 months prior to the inspection), the facility's SWPPP and site map were inadequate and out of date. The facility also had no record of any annual reviews prior to 2022. This is noted as item #9 in the summary of this report.

The NPDES permit Stormwater Requirements section 6b also requires that the facility include a list of all BMPs and a narrative explaining how the BMPs will be implemented. The facility's SWPPP does not contain a complete list of the facility's BMPs and does not include a narrative explaining how the BMPs will be implemented. This is noted as item #10 in the summary of this report.

Other Observations

As part of the facility's operation, they generate a large amount of waste mop water with a high pH. This mop water is collected in totes and stored on the back lot for disposal by a third-party vendor, Safety-Kleen, according to Mr. Ables. Mr. Ables explained that the facility was currently trying a pretreatment system, so they would be able to treat and discharge the waste mop water to the city's sanitary sewer system. I suggested the facility work with the city and MDNR on the pretreatment system to ensure they were approved to discharge to the city. This was noted as item #2 on the NOPF that was left on-site. After the inspection, Ms. Behlke-Entwisle emailed me that the facility only needed to work with the city to ensure they were approved to discharge the treated wastewater.

SUMMARY

During the exit briefing on December 12, 2022, I discussed the findings of my inspection and left a NOPF on-site for the following (attachment 9):

1. Submit records discussed during inspection
 - SWPPP, Inspections, Annual Review, Training, Sampling
2. Work with city & MDNR on new pretreatment system

After the inspection, the following potential findings were determined:

3. Failure to maintain records required by the facility's permit and SWPPP.
4. Failure to include an adequate site map as required.
5. Failure to train all personnel involved in the facility's stormwater manage program.
6. Failure to include all potential pollutants in the facility's SWPPP.
7. Failure to include current personnel managing the facility's stormwater program.
8. Failure to conduct monthly facility inspections and quarterly visual inspections.
9. Failure to conduct annual reviews of the facility's SWPPP.
10. Failure to include a list of all BMPs and a narrative explaining how the BMPs will be implemented.

The facility has not submitted a response to the NOPF as of the writing of this report.

**BRIAN
D'ALFONSO**
Brian D'Alfonso
Biologist

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**NICOLE
MORAN**
Nicole Moran
Section Chief, DWIS

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ATTACHMENTS:

1. NPDES Industrial Storm Water Worksheet (6 pages)
2. Photo Log and Photos (8 pages)
3. Facility Layout with Photo Locations (1 page)
4. MDNR permit number MOR23D115 (29 pages)
5. June 20, 2019, MDNR Inspection Report (7 pages)
6. April 25, 2022, Alltrista Plastics LLC SWPPP (26 pages)
7. Alltrista Plastics, LLC Site Maps (3 pages)
8. Facility Training Records (7 pages)
9. December 12, 2022, NOPF (1 page)