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

Frank Kills In Water
Facilities Manager
Rosebud Casino
fkillsinwater@rosebud-casino.com

Re: Inspection Report for Rosebud Casino Wastewater Treatment Facility, NPDES Permit No. SD0034584

Dear Mr. Kills In Water:

On September 21, 2022, representatives of the U.S. Environmental Protection Agency inspected the Rosebud Casino Wastewater Treatment Facility located in Todd County, South Dakota to evaluate compliance with the facility's 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 and Rosebud Sioux Tribe Environmental Program 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

Ivan Crow Eagle
ivan.croweagle@rst-nsn.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: 2022.11.21 08:54:27 -07'00'
Stephanie Meyers
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

1) Rosebud Casino NPDES Inspection Report – Wastewater Treatment Facility
2) Rosebud Casino Photo Log

cc: The Honorable Scott Herman, President, Rosebud Sioux Tribe (via email)
Ivan Crow Eagle, Environmental Director, Rosebud Sioux Tribe (via email)

NPDES Inspection Report – Wastewater Treatment Facility

National Database Information	
Inspection Date: September 21, 2022	Inspection Type: CEI - Wastewater Treatment Facility
Entry/Exit Time: 1:10 pm / 4:00 pm	NPDES ID Number: SD0034584
NAICS Code: 221320	Inspection ID: 202209_SD0034584
Lead inspector and affiliation: Stephanie Meyers / EPA Region 8	
Inspector and affiliation: Akash Johnson / EPA Region 8	

Facility Location Information (*Name/Location/ Mailing Address*)	
Site/Facility Name & Location: Rosebud Casino Wastewater Treatment Facility 30421 US Highway 83 Todd County, South Dakota 69201	Email Report to: Mr. Frank Kills In Water Facilities Manager Rosebud Casino fkillsinwater@rosebud-casino.com

Contact Information		
	Name(s)/Title	
Facility Contacts: *(indicate primary lead and present during inspection)*	Frank Kills In Water / Facilities Manager / Rosebud Casino / primary lead during the inspection	
	Kingsley Ryan / Operator / Rosebud Casino / present during inspection	
	James Harp / Maintenance Worker / Rosebud Casino / present during inspection	
Person/Company meeting definition of "Operator"	Rosebud Casino	
Authorized Official(s) (Per NOI?)	Frank Kills In Water / Facilities Manager / Rosebud Casino	

Permit Information		
Is the permit on site and available? Yes	Lagoon Category: Individual Permit	Reporting Frequency: Quarterly
Effective Date: October 1, 2017	Expiration Date: September 30, 2022 – Administratively continued at time of the inspection	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Permittee – Frank Kills In Water	
Receiving Water(s): Unnamed drainageway tributary to Rock Creek Outfall 001 from the Ecolo-Chief Plant located near Latitude 43.000556˚, Longitude -100.576389˚		
Regulatory Inspector's source of information: Statement of basis for the permit, permit, facility records, EPA records, EPA databases, facility representatives and facility observations.		

Areas Evaluated During Inspection		
Permit	**Self-Monitoring Program**	Pretreatment
Records	Compliance Schedule	Pollution Prevention
Facility Site Review	Laboratory	Stormwater
Effluent/Receiving Waters	**Operations and Maintenance**	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** **303-312-6938**	**11/7/2022**
Reviewer Name	Address/Phone Number	Date
Akash Johnson	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **303-312-6067**	**11/15/2022**
Supervisor Signature/Name	Address/Phone Number	Date
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2022.11.18 09:19:39 -07'00'	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202**	**11/18/2022**
Michael Boeglin	**303-312-6250**	

Inspection Narrative and Site Description

The inspection was conducted at the Rosebud Casino Wastewater Treatment Facility (WWTF or facility) located in Todd County, South Dakota, on the Rosebud Reservation, to evaluate compliance with its National Pollutant Discharge Elimination System (NPDES) permit. The EPA is responsible for implementing the NPDES program in Indian Country within the State of South Dakota. The inspection was announced approximately two weeks prior to the inspection to coordinate logistics for the inspection. On September 21, 2022, U.S Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Akash Johnson met with Facilities Manager Frank Kills In Water and Operators Kingsley Ryan and James Harp, all with Rosebud Casino. The EPA inspectors presented their credentials and had an opening conference in the WWTF office to explain the purpose of the inspection. The inspectors proceeded to ask questions of facility representatives, review operation and maintenance records, and inspect the facility to help the inspectors evaluate compliance with the facility's permit. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.

The Rosebud Casino is owned and operated by the Rosebud Sioux Tribe and is located in Todd County, South Dakota. The Rosebud Casino consists of a hotel (Quality Inn), casino, restaurant, fuel plaza, administration offices, and the WWTF. The Quality Inn hotel has 60 guest rooms, two meeting rooms, and an 8,600-gallon indoor pool. Wastewater from the hotel, casino, fuel plaza, administration offices, and restaurant is piped to the WWTF. Before the pool is drained for maintenance, the water is tested for the total chlorine levels. Sodium Thiosulfate is added until all chlorine is neutralized before being drained to the WWTF. The kitchen in the restaurant is connected to a cement vault grease trap, in line with the sewer system. Backup power generators are maintained onsite.

The WWTF is an activated sludge Ecolo-Chief package plant, which consists of a primary separation tank, four aeration tanks, a secondary clarifier, an aerobic digester for sludge, and a UV disinfection system. The average design flow of the system is 58,000 gallons per day (gpd) with a peak flow design of 87,900 gpd.

After the opening conference, inspectors went to inspect the lift station wet well (photo 61), which is located just before the influent flow meter (photo 62) and primary separation tank (photo 63). Raw sewage enters the covered primary separation tank (photo 63) where primary separation and digestion of floatables occurs. Sludge is not routinely wasted from the primary separation tank. Inspectors then observed wastewater flowing to the four aeration tanks (photo 64) in sequence where aeration decreases as wastewater flows through each of the four tanks. Wastewater then flows to the secondary clarifier (photo 65) where the activated sludge settles out and water overflows across a surface weir. Facility representatives stated sludge from the secondary clarifier is pumped down once a week to the aerobic digester (photo 66), and sludge from the digester and secondary clarifier is pumped back to the primary separation or the first aeration tank for additional treatment. Facility representatives stated they can also pump sludge from the secondary clarifier to the primary separation tank, for occasions such as cleaning or inspection of the secondary clarifer. A v-notch weir in the clarifier prevents floating material from entering the UV disinfection line. Each tank is drained annually and visually inspected/repaired for leaks. The final treatment phase is the disinfection process, where wastewater flows through an ultraviolet (UV) light system (photo 67). UV bulbs are cleaned weekly and replaced every 6 months. A flow meter (photo 68) measures the treated effluent after UV disinfection and then is continuously

discharged through a pipe (photo 69) to the outfall (photo 70). Treated effluent flows in a channel into a natural vegetated field (photo 71) just north of the Ecolo-Chief WWTF. A facility representative stated they have never observed treated effluent flow beyond the tree line north of the facility, which is approximately 0.1 mile from the WWTF.

After inspecting the WWTF, inspectors then inspected the grease interceptor (photo 72), which facility representatives indicated is pumped out once every two months.

At the end of the inspection, the inspectors held a closing conference with Mr. Kills In Water where they discussed preliminary findings.

On October 18, 2022, inspectors requested sampling and laboratory records from monitoring periods ending on March 31, 2021; December 31, 2021; March 31, 2022; and June 30, 2022, to evaluate the facility's compliance with effluent limits and use of EPA approved sampling and analysis methods. These records were received on November 9, 2022, after the inspection report had been completed. Records will be reviewed separately and any findings pertaining to the review of these records will be coordinated with facility representatives.

Findings, Corrective Actions and Recommendations
Finding #1: Calibration records for pH meter calibration were not properly documented. The individual performing pH meter calibration was not being documented in records. **Permit requirement:** 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 initials or 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 initials or name(s) of individual(s) who performed the analyses; 2.6.6 References and written procedures, when available, 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:** Ensure that the individual performing pH meter calibration is being documented. Provide the EPA and Tribe with a description of the corrective actions taken to address this finding.

NPDES Inspection Report – Industrial User

Name of industry and location:	**Control authority / Permit No. / Facility ID:**
Ross Reels 1101 Mayfly Drive Montrose, Colorado 81401	City of Montrose Facility did not have a City Pretreatment Industrial User Permit. NPDES ID: COPU00171 Inspection ID: 202309_COPU00171 NAICS Code: 333999 - All Other Miscellaneous General Purpose Machinery Manufacturing Latitude: 38.48481 ˚N, Longitude: -107.89256˚W
Date of visit:	**Time of visit:**
September 26, 2023	9:48 am – 11:28 am

Name(s) / Affiliation of inspector(s):

Emilio Llamozas / U.S. Environmental Protection Agency, Region 8 (lead)
Stephanie Passarelli / U.S. Environmental Protection Agency, Region 8
Hyrum Webb / City of Montrose

Name / Title / Affiliation:

Tony Lugard / Director of Operations / Ross Reels
Rob Hauck / Director of Engineering / Ross Reels
Katlyn Nagel / Engineer / Ross Reels

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	**12/04/2023**
Emilio Llamozas	**303-312-6407**	
Reviewer Name	Address/Phone Number	Date
Stephanie Passarelli	**U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202**	**12/05/2023**
	303-312-6803	
Supervisor Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2023.12.05 11:41:42 -07'00'	**U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202**	**12/05/2023**
Emilio Llamozas	**303-312-6407**	

Inspection Description:

On September 26, 2023, U.S. Environmental Protection Agency (EPA) inspectors Emilio Llamozas and Stephanie Passarelli (jointly referred to as inspectors) and the City of Montrose (City) inspector Hyrum Webb conducted an industrial user inspection of Ross Reels in Montrose, Colorado as part of a pretreatment compliance inspection (PCI) of the City. The City had identified Ross Reels as an Industrial User (IU), but had determined that the facility did not meet the significant industrial user criteria and thus had not required a significant industrial permit for the facility. The inspection was announced to Ross Reels the morning of the inspection.

Upon arriving to the facility at approximately 9:48 am, Mr. Webb introduced the inspectors to Ross Reels' Director of Operations, Tony Lugard. The inspectors also met Rob Hauck, Ross Reel's Director of Engineering and Katlyn Nagel, an Engineer with Ross Reels. The inspectors began the opening conference by presenting their inspector credentials and explaining the general purpose and procedures of the inspection. During the opening conference, Mr. Lugard, Mr. Hauck and Ms. Nagel provided an overview of the facility's operations, focusing on the processes that generate wastewater, the wastewater pretreatment system, and the plans to build a new anodizing facility.

Following the opening conference, Mr. Lugard, Mr. Hauck and Ms. Nagel accompanied the group of inspectors on a facility walkthrough. To document and record the conversation and inspection observations, the inspectors took notes using checklists with questions applicable to the industrial user. Photographs taken during the inspection are included in the attached photo log.

EPA inspectors conducted a closing conference with Mr. Lugard, Mr. Hauck and Ms. Nagel and provided general observations and preliminary findings from the inspection. The EPA and City representatives left the facility at approximately 11:28 am.

On October 12, 2023, the EPA sent preliminary findings from the inspection via email to Mr. Lugard and Mr. Hauck. On October 13, 2023, Mr. Lugard sent an email response indicating that secondary containment was installed on the tumbler soap and provided a photo of the secondary containment. On November 8, 2023, Mr. Lugard sent an email response indicating that the Ross Reels manufacturing facility and the future anodizing facility are two noncontiguous business parcels and two noncontiguous buildings. His email indicated that the Ross Reels manufacturing facility is located at 1101 Mayfly Drive and the future Ross Reels anodizing facility will be located at 1331 Mayfly Drive Suite G104. Mr. Lugard requested a permit application from the City and indicated that he would submit a zero discharge wastewater permit application to the City for the future Ross Reels anodizing facility. On November 29, 2023, the City sent an industrial user permit application to Ross Reels for its new anodizing facility. Mr. Lugard indicated that they would complete the industrial user permit application and send it to the City. He also indicated that the goal is to have the anodizing facility operational by December 21, 2023.

1. What does this industry produce?

The facility manufactures fly fishing reels and fly fishing accessories (plyers, clippers, fly tying devices, etc.). The facility has CNC machines that create the different parts for the reels. The parts are then sent to an offsite facility in California for anodizing and then brough back for assembly.

2. How is the industry classified by the POTW?

The City classified Ross Reels as an Industrial User (IU) and had not required a pretreatment industrial user permit for this facility. The machining facility located at 1101 Mayfly Drive, Montrose, Colorado does not meet the applicability criteria for metal finishing found at 40 CFR.10(a) because the facility does not perform any of the six metal finishing core operations.

At the time of the inspection, Ross Reels was in the process of building a new anodizing facility located at 1331 Mayfly Drive, Suite G-104, Montrose, Colorado. The new anodizing facility is expected to begin operations by the end of December 2023. Ross Reels indicated that the anodizing process will be a zero-discharge process because the wastewater will be treated in an evaporator and the solids will be disposed off-site. EPA did not inspect the new anodizing facility as part of this inspection because the facility was under active construction.

3. Have there been any significant changes in processes or flow?

No changes have occurred at the facility since Ross Reels started operations. The Ross Reels machining facility located at 1101 Mayfly Drive, Montrose, Colorado does not meet the applicability criteria for metal finishing found at 40 CFR.10(a) because the facility does not perform any of the six metal finishing core operations.

Ross Reels is building an anodizing facility located at 1331 Mayfly Drive, Suite G-104, Montrose, Colorado. Ross Reels indicated that the new anodizing facility will be a zero wastewater discharge facility. Operations at the new facility are expected to begin at the end of December 2023.

Since the Ross Reels machining facility located at 1101 Mayfly Drive and the future Ross Reels anodizing facility located at 1331 Mayfly Drive, Suite G-104 operations occur at two different noncontiguous locations, they are considered two different facilities. The Ross Reels anodizing facility meets the applicability criteria for metal finishing found at 40 CFR 433.10(a). Ross Reels plans to apply for a zero-discharge water permit from the City, since the facility is not planning to discharge their wastewaters to the City.

4. What raw materials are used?

The facility uses the following materials:

- Aluminum 6061-T651
- Stainless steel
- Silicon bronze
- Titanium
- 5080 Coolant
- Oil

- Hybrid polymer ceramic media
- Cleaning soap (Roto Brite)

5. What processes are used to make the product(s)? Indicate any wastes generated and destination of wastes.

Ross Reels receives aluminum spars that are cut in different puck sizes. The aluminum pucks are then machined in approximately 28 Computer Numerical Control (CNC) machines to different specifications. The CNC machines have a sump where used oil collects. The used oil is disposed offsite (photo 559). The CNC machines are cleaned on a regular basis and the used coolant is stored in a tote (photo 558). The used coolant is sent to the onsite evaporator (photo 560). The liquid is evaporated and the solids are collected for offsite disposal. Safety Clean removes the solids and disposes them off-site.

The aluminum parts are then deburred by hand and then placed in a tumbler for polishing (photo 563). Hybrid polymer ceramic media and soap (Roto Brite) are added to the tumbler. Wastewater from the tumbler flows out of into the secondary containment for the tumbler. Some of the solids settle in secondary containment and are collected for offsite disposal. The wastewater then flows out of the secondary containment via a white PVC pipe into the trench drain and into the sump (photo 564). The wastewater in the sump pump is sent to a centrifuge where additional solids are removed (photo 565). Ross Reels tested the wastewater after the centrifuge in June 2022 and provided the results to the City. Based on the review of the results, the City determined that Ross Reels did not need a pretreatment industrial user permit.

The parts that need anodizing are sent offsite to an anodizing facility in California. In the future Ross Reels will send the parts to their new anodizing facility located in Montrose, Colorado. After anodizing, parts are returned to the Montrose facility where they are assembled into the final products.

The stainless steel parts are placed in a spinner for polishing (photo 561). The wastewater from the spinner is filtered into a 5-gallon bucket that is stored next to the sink (photo 565) and then placed into a drum (photo 562). The wastewater in this drum is pumped to the evaporator when it reaches a certain height. There was a sign above the spinner that read, “Attention – Do not send spinner water down drain – Dispose of spinner water in labeled bin.” Ross Reels representatives indicated that staff are trained not to send spinner water down the drain.

6. Where is water used and what is the source of the water (city, well, river, etc.)?

The facility uses City water in its operations, and the approximate monthly usage of water is 9,000 to 10,000 gallons which includes process wastewater and sanitary wastewater. Water is used for manufacturing of parts in the CNC machines and to clean parts in the tumbler and spinner.

7. Describe the processes which discharge wastewater.

Please refer to Sections 5 and 9 of the inspection report for a description of the processes that discharge wastewater.

8. Describe the sample location. Are the CA and industry using the same location?

Ross Reels discharges wastewater from the tumblers after it passes through the centrifuge (photo 565). Ross Reels indicated that approximately 80 gallons per day four times per week are discharged from the centrifuge to the City's sanitary sewer. Ross Reels tested the wastewater after the centrifuge in June 2022 and provided the results to the City. Based on the review of the results, the City determined that Ross Reels did not need a pretreatment industrial user permit.

9. Describe the treatment system in place.

The facility discharges wastewater from the tumbler into a secondary containment (photo 564), which collects some of the solids as they settle. The solids are collected and disposed off-site. The wastewater then goes to the centrifuge which further separates solids (photo 565). The solids are collected from the centrifuge and disposed off-site. The wastewater is then discharged to the City.

The CNC machines have a sump where used oil collects. The used oil is disposed offsite (photo 559).
The CNC machines are cleaned on a regular basis and the used coolant is stored in a tote (photo 558). The used coolant is sent to the onsite evaporator (photo 560). The liquid is evaporated and the solids are collected for offsite disposal. Safety Clean removes the solids and disposes them off-site.

10. What chemicals are maintained at the facility? How are they stored? Is adequate spill prevention in place?

The facility stores 110 gallons of semi synthetic metal working fluid that is used in the CNC machines (H8L25080D) (photo 567). There were no drains in this area of the facility.

The facility also stores the tumbler soap (Roto Brite) next to the tumbler (photo 566). The tumbler soap container was stored without secondary containment next to the trench drain that sends wastewater to the centrifuge which discharges to the City sewer. Therefore, there is a potential for a slug discharge from the tumbler soap if there was a spill or leak from the tumbler soap container. On October 13, 2023, Mr. Lugard sent an email response indicating that secondary containment was installed on the tumbler soap and provided a photo of the secondary containment.

11. Are any hazardous wastes stored or discharged?

The Ross Reels representatives indicated that no hazardous wastes are stored or discharged from the facility. The facility representatives indicated that the solids collected in the evaporator are not considered hazardous waste.

FINDINGS AND CORRECTIVE ACTIONS

The following findings were identified during the inspection. The EPA has requested the City work directly with Ross Reels to oversee correction of these deficiencies. No response from Ross Reels to the EPA is requested at this time.

Finding 1 – The tumbler soap was stored without secondary containment on the trench drains that discharges to the City.

The facility stores the tumbler soap (Roto Brite) next to the tumbler (photo 566). The tumbler soap container was stored without secondary containment next to the trench drain that sends wastewater to the centrifuge which discharges to the City sewer. Therefore, there is a potential for a slug discharge from the tumbler soap if there was a spill or leak from the tumbler soap container. On October 13, 2023, Mr. Lugard sent an email response indicating that secondary containment was installed on the tumbler soap and provided a photo of the secondary containment.

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), the POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to, "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is 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. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

(A) Description of discharge practices, including non-routine batch Discharges;
(B) Description of stored chemicals;
(C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
(D) If necessary, procedures 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 response."

Corrective Action

On October 13, 2023, Mr. Lugard sent an email response indicating that secondary containment was installed on the tumbler soap and provided a photo of the secondary containment. No additional response is required at this time.

Finding 2 – Ross Reels new anodizing facility needs to apply for a zero discharge industrial user permit.

Ross Reels is building a new anodizing facility. The new anodizing facility located at 1331 Mayfly Drive, Suite G-104, Montrose, Colorado and is expected to begin operations by the end of December 2023. Ross Reels

indicated that the anodizing process will be a zero-discharge process because the wastewater will be treated in an evaporator and the solids will be disposed off-site.

On November 8, 2023, Mr. Lugard sent an email to the EPA indicating that the Ross Reels manufacturing facility located at 1101 Mayfly Drive and the future anodizing facility located at 1331 Mayfly Drive Suite G104 are two noncontiguous business parcels and two noncontiguous buildings. Mr. Lugard indicated that he would submit a zero discharge wastewater permit application to the City for the future Ross Reels anodizing facility.

Since the Ross Reels machining (1101 Mayfly Drive) and the future anodizing (1331 Mayfly Drive, Suite G-104) operations occur at two different noncontiguous locations, they are considered two different facilities. The anodizing facility (1331 Mayfly Drive, Suite G-104) meets the applicability criteria for metal finishing found at 40 CFR 433.10(a). Ross Reels plans to apply for a zero-discharge water permit from the City, since the facility is not planning to discharge their wastewaters to the City. The machining facility (1101 Mayfly Drive) does not meet the applicability criteria for metal finishing found at 40 CFR.10(a) because the facility does not perform any of the six metal finishing core operations.

Ross Reels is required to submit an industrial user permit application to the City for the new anodizing facility as required by the City Ordinance Section 3-6-6.

Pretreatment Requirements

Sec. 3-6-6. - Industrial wastewater discharge permits.

(A) Industrial Wastewater Discharge Permits Required. All Significant Industrial Users proposing to connect to or discharge wastewater into the POTW shall apply for and obtain an Industrial Wastewater Discharge Permit from the City. An existing Significant Industrial User that has filed a timely wastewater Industrial Wastewater Discharge Permit application in accordance with these Regulations may continue to discharge if authorized by the City.

(B) New Industrial Users; Applying for an Industrial Wastewater Discharge Permit. Any Industrial User required to obtain an Industrial Wastewater Discharge Permit who proposes to begin or recommence discharging into the POTW must apply for and obtain such permit prior to the beginning or recommencing of such discharge. The Industrial User shall file a wastewater Industrial Wastewater Discharge Permit application on forms provided by the City containing the information specified in Subsection (F) below. The completed application for the Industrial Wastewater Discharge Permit must be filed at least 90 days prior to the date upon which any discharge will begin or recommence. An Industrial Wastewater Discharge Permit application containing incomplete or inaccurate information will not be processed and will be returned to the Industrial User. The City may issue a wastewater Industrial Wastewater Discharge Permit at any time after receipt of the completed wastewater Industrial Wastewater Discharge Permit application.

(C) Existing Industrial Users; Applying for an Industrial Wastewater Discharge Permit Re-issuance. An Industrial User with an expiring an Industrial Wastewater Discharge Permit shall apply for a new Permit by submitting a complete wastewater Industrial Wastewater Discharge Permit application at least 90 days prior to the expiration of the Industrial User's existing Permit. The Industrial User shall file a wastewater Industrial Wastewater Discharge Permit application on forms provided by the City

containing the information specified in Subsection (F) below. An Industrial Wastewater Discharge Permit application containing incomplete or inaccurate information will not be processed and will be returned to the Industrial User. An Industrial User with an existing Industrial Wastewater Discharge Permit that has filed a complete and timely application may continue to discharge, as approved in writing by the City, through an administrative extension of the existing permit if the delay in permit issuance is not due to any act or failure to act on the Industrial User's part.

(D) Other Industrial Users. The City may require other Industrial Users to apply for and obtain an Industrial Wastewater Discharge Permit, permit or other control mechanism to carry out the purposes of these Regulations. The City may issue an Industrial Wastewater Discharge Permit, a zero-discharge permit or other control mechanism, including, but not limited to, authorizations to discharge and letters authorizing discharge as determined to be appropriate.

Corrective Action

Submit an industrial user permit application to the City of Montrose for the new anodizing facility. On November 8, 2023, Mr. Lugard sent an email response indicating that the Ross Reels manufacturing facility and the future anodizing facility are two noncontiguous business parcels and two noncontiguous buildings. The Ross Reels manufacturing facility is located at 1101 Mayfly Drive and the future Ross Reels anodizing facility is located at 1331 Mayfly Drive Suite G104. Mr. Lugard requested a permit application from the City and indicated that he would submit a zero discharge wastewater permit application to the City for the future Ross Reels anodizing facility. On November 29, 2023 the City sent an industrial user permit application to Ross Reels for its new anodizing facility. Mr. Lugard indicated that they would complete the industrial user permit application and send it to the City. He also indicated that the goal is to have the anodizing facility operational by December 21, 2023.

NPDES Inspection Report – Industrial User

Name of industry and location:	**Control authority / Permit No. / Facility ID:**
Royal Crest Dairy, Inc. 800 Weaver Park Road Longmont, Colorado 80501	City of Longmont Permit No. 22-07-115 NPDES ID: COPU00170 Inspection ID: 202301_COPU00170 NAICS Code: 31151 – Dairy Product Manufacturing Latitude: 40.162177 ˚N, Longitude: -105.075941˚W
Date of visit:	**Time of visit:**
January 19, 2023	1:20 pm – 3:05 pm

Name(s) / Affiliation of inspector(s):

Stephanie Meyers / U.S. Environmental Protection Agency, Region 8 (lead)
Emilio Llamozas / U.S. Environmental Protection Agency, Region 8
Mary Paterniti / City of Longmont

Name / Title / Affiliation:

Roy Ladrick / General Manager / Royal Crest Dairy, Inc.
Terry Koenig / Maintenance Lead / Royal Crest Dairy, Inc.

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
STEPHANIE MEYERS Digitally signed by STEPHANIE MEYERS Date: 2023.02.15 17:38:55 -07'00'	**U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202**	**2/10/2023**
Stephanie Meyers	**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**	**2/13/2023**
	303-312-6407	
Supervisor Signature/Name	Address/Phone Number	Date
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2023.02.15 08:12:24 -07'00'	**U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202**	**2/16/2023**
Michael Boeglin	**303-312-6250**	

Inspection Description:

On January 19, 2023, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Emilio Llamozas (jointly referred to as inspectors) and the City of Longmont (City) inspector Mary Paterniti conducted an industrial user inspection of Royal Crest Dairy, Inc. (Royal Crest or facility) in Longmont,

Colorado as part of a pretreatment compliance inspection (PCI) of the City. The City had identified Royal Crest as a Significant Industrial User (SIU) permitted to discharge to the City's sanitary sewer system under Permit Number 22-07-115 (permit). The inspection was announced to Royal Crest the afternoon of the inspection.

Upon arriving to the facility at approximately 1:20 pm, Mr. Koenig, Maintenance Lead for Royal Crest, introduced the inspectors to Royal Crest's General Manager, Roy Ladrick. The inspectors began the opening conference by presenting their credentials and explaining the general purpose and procedures of the inspection. During the opening conference, Mr. Ladrick provided an overview of the facility's operations, focusing on the processes that generate wastewater and the planned updates to the facility.

Following the opening conference, Mr. Ladrick and Mr. Koenig accompanied the group of inspectors on a facility walkthrough, with focus placed on the processing and bottling of dairy products, chemical and waste storage areas, and the sampling point. To document and record the conversation and inspection observations, the inspectors took notes using bound checklists with questions applicable to the permitted industrial user. Photographs taken during the inspection are included in the attached photo log.

EPA inspectors conducted a closing conference with Mr. Ladrick and Mr. Koenig and provided general observations and preliminary findings from the inspection. The EPA and City representatives left the facility at approximately 3:05 pm.

1. What does this industry produce?

The facility is a dairy processing and bottling facility that produces various milk products, sour cream, buttermilk, yogurt, and ice cream. The facility also stores packaged food products that are made at other facilities for home delivery.

2. How is the industry classified by the POTW?

The City classified Royal Crest as a Significant Industrial User (SIU) because the facility discharges an average of 25,000 gallons per day or more of process wastewater to the POTW, which is in accordance with 40 C.F.R. 403.3(v). The facility is also a categorical industry under 40 C.F.R Part 405: Dairy Products Processing Point Source Category, Subpart B – Fluids Products Subcategory, however there are no pretreatment standards established for this subcategory; therefore, the facility is subject to the requirements of 40 C.F.R. 403.

3. Have there been any significant changes in processes or flow?

No changes have occurred at the facility since Royal Crest started operations in 1995. The facility has future sustainability plans that will likely reduce wastewater flows to 45,000 gallons per day. They also have plans to install an equalization tank system for pretreatment, where a lift station will pump the facility's wastewater to two 14,000-gallon tanks that will hold process wastewater and will monitor pH and turbidity. The planned tank upgrades are further described in Section 9.

4. What raw materials are used?

The facility uses the following materials:

- Dairy products (milk, chocolate milk, sour cream, cream, buttermilk, yogurt, ice cream, etc.)
- Sugar
- Cocoa
- Soy-based products
- Various pre-packaged food products for home delivery only
- Caustics
- Sanitizers
- Acids (sulfuric acid used for pH neutralization)

5. What processes are used to make the product(s)? Indicate any wastes generated and destination of wastes.

Royal Crest receives tanker trucks of raw milk from Dairy Farmers of America and Mile High Dairy. The raw milk is placed into holding silos, and is then tested for bacteria, allergens, and butter fats. Raw milk that does not pass these tests is pumped to the 2,000-gallon slop tank in the tanker truck receiving bay (Photo 255). Facility representatives stated this milk is then pumped into a truck owned by McDonald Farms Enterprises, Inc. (Photo 256), who transports and treats the waste. According to facility representatives, McDonald Farms hauls off approximately six to eight 6,000-gallon loads each month.

The raw milk that does pass all tests goes through a centrifuge to have fat contents separated out. The separated cream fat is used for various products and stored in a separate tank. The raw milk that had been separated then goes through the pasteurization process, where milk is heated to a specific temperature for a set time period to kill harmful bacteria. Once the pasteurization process is complete, milk is packaged into various bags, bottles, or cartons and stored in refrigerated rooms prior to being loaded up into trucks to be shipped out.

Sometimes, the by-products of the milk, such as buttermilk and cream are used for other products. A culture tank is used for certain products such as buttermilk, sour cream, and yogurt. Royal Crest also produces chocolate milk, which requires the use of added product and a blender.

Royal Crest conducts a clean-in-place (CIP) of all tanks using HydroxySan every 24 hours on production days. The CIP equipment has turbidity meters that measure the wastewater. High turbidity wastewater from the CIP process is pumped to the slop tank and hauled off by McDonald Farms Enterprises, Inc. The low turbidity wastewater is sent to the pH equalization tank.

6. Where is water used and what is the source of the water (city, well, river, etc.)?

The facility uses City water in its operations, and the approximate monthly usage of water is 1.6 million gallons. Water is used for cleaning of tanks and rinsing of equipment. Both the boiler that pasteurizes the dairy products and refrigeration system also utilize water.

7. Describe the processes which discharge wastewater.

Please refer to Sections 5 and 9 of the inspection report for a description of the processes that discharge wastewater.

8. Describe the sample location. Are the CA and industry using the same location?

Royal Crest has two outfalls that discharge to the City's collection system; Outfall 01, which is the final discharge location and Outfall 02, which is the manhole downstream of Outfall 01 for the City's compliance

sampling. For the purpose of the permit, Outfall 02 is for City monitoring only and there are no additional sampling requirements for this outfall. Outfall 01 is a flume inside the private manhole in the parking lot in front of the processing building and downstream of the sand/oil interceptor. A pump pulls this water into a refrigerated ISCO sampler (Photo 259) for sample collection on Monday, Tuesday, Thursday, and Friday at 2:00 pm. A courier then picks up the samples each day, loads them into a cooler with ice, and takes them to the laboratory for analysis. The City takes their compliance sample at Outfall 01 and conducts independent monitoring at Outfall 02 which is a manhole downstream of Outfall 01.

9. Describe the treatment system in place.

A drainage system in the production area captures all cleaning water and process wastewater and sends it to a 5,000 gallon pH equalization tank near the loading dock (Photo 257). CIP low turbidity wastewater and wastewater from cleaning the pasteurizer tanks is also sent through the pH equalization tank. The pH equalization tank is treated with sulfuric acid, if the pH needs to be lowered to meet the permit limits. The process wastewater then flows through a sand and oil separator, which is located underground via manholes near the loading dock (Photo 258). After this, wastewater then flows to the City's wastewater treatment system. The milk receiving bay also has a sand and oil separator that discharges downstream of the other sand and oil separator near the loading dock, but prior to Outfall 02.

Section 3 describes the plans for a new treatment system. Facility representatives explained that when the new treatment system is in place, the pH equalization tank will no longer be used and will be removed from the facility. The facility plans to install a lift station that will pump the wastewater from the facility to two 14,000-gallon tanks. The two 14,000-gallon tanks that will be installed will be top-agitated tanks with CIP capabilities. They will also have containment structures around them should a spill event occur. Testing of tank water will be conducted prior to any discharge to the City for pH and turbidity. If the test results are above the BOD, TSS or pH permit limits, the wastewater will be hauled off by McDonald Farms Enterprises, Inc. in order to avoid permit exceedances.

10. What chemicals are maintained at the facility? How are they stored? Is adequate spill prevention in place?

A 200-gallon tote of sulfuric acid is stored next to the pH equalization tank. 55-gallon drums of caustics and sanitizers (HydroxySan and Pro-Oxine) are stored in an area off of the processing room over secondary containment (Photo 260). Acids are stored in 55-gallon drums over secondary containment entirely separate from all other chemical storage areas (photo 261).

11. Are any hazardous wastes stored or discharged?

No hazardous wastes are stored or discharged from the facility.

FINDINGS AND CORRECTIVE ACTIONS

The following findings were identified during the inspection. The EPA has requested the City work directly with Royal Crest to oversee correction of these deficiencies. No response from Royal Crest to the EPA is requested at this time.

Finding 1 – The facility did not include all of the required components in its Waste Management Plan (WMP).

The facility's WMP is missing several of the elements required by the City pertaining to chemical storage and spills and a facility diagram. These required elements are found in the City Ordinance Section 14.08.350. The three elements that were missing in the WMP were:

1. An ongoing and complete inventory and description of the types and quantities of pollutants and chemicals used or stored by the industrial user; and
2. A diagram of the facility including the process and storage location(s), and the locations of floor drains to sanitary or storm sewers; and
3. A description of spill containment, treatment and disposal methods of pollutants and chemicals used or stored by the industrial user.

Pretreatment Requirements

According to the City Ordinance Section 14.08.350, the following elements are required to be in the facility's WMP and are currently missing:

1. An ongoing and complete inventory and description of the types and quantities of pollutants and chemicals used or stored by the industrial user; and
2. A diagram of the facility including the process and storage location(s), and the locations of floor drains to sanitary or storm sewers; and
3. A description of spill containment, treatment and disposal methods of pollutants and chemicals used or stored by the industrial user.

Corrective Action

Update the WMP for the facility that includes all the elements described above. Provide the City with a copy of the WMP.

Finding 2 – The ISCO sampler did not contain a backup thermometer.

The ISCO sampler that pulls process wastewater from underground piping that flows to Outfall 01 did not contain a backup thermometer to ensure accuracy of temperature to meet samples preservation requirements of 6° C. Facility representatives stated the ISCO sampler temperature is calibrated once per year, but it is best practice to maintain another thermometer to ensure accuracy.

Recommendation

It is recommended that an independently calibrated thermometer be placed inside the ISCO sampler to ensure accurate temperature readings of the sampler to show that BOD and TSS samples are stored at below 6° C. Provide the City with a description of how this recommendation was addressed.

NPDES Inspection Report – Industrial User

Name of industry and location:	**Control authority / Permit No. / Facility ID:**
San Juan Fabrication and Powder Coating 2171 E. Main Street Montrose, Colorado 81401	City of Montrose Facility does not have a City Pretreatment Industrial User Permit. NPDES ID: COPU00147 Inspection ID: 202309_COPU00147
Date of visit:	**Time of visit:**
September 27, 2023	8:10 am – 8:45 am

Name(s) / Affiliation of inspector(s):

Emilio Llamozas / U.S. Environmental Protection Agency, Region 8 (lead inspector)
Stephanie Passarelli / U.S. Environmental Protection Agency, Region 8
Hyrum Webb / City of Montrose

Name / Title / Affiliation:

Gabe Welfelt / Owner / San Juan Fabrication and Powder Coating

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
STEPHANIE PASSARELLI Digitally signed by STEPHANIE PASSARELLI Date: 2023.12.19 12:55:58 -07'00'	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202**	**12/14/2023**
Stephanie Passarelli	**303-312-6803**	
Reviewer Name	Address/Phone Number	Date
Emilio Llamozas	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202**	**12/19/2023**
	303-312-6407	
Supervisor Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2023.12.19 11:25:56 -07'00'	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202**	**12/19/2023**
Emilio Llamozas	**303-312-6407**	

Inspection Description:

On September 27, 2023, U.S. Environmental Protection Agency (EPA) inspectors Emilio Llamozas and Stephanie Passarelli (jointly referred to as inspectors) and the City of Montrose (City) inspector Hyrum Webb conducted an industrial user inspection of San Juan Fabrication and Powder Coating in Montrose, Colorado as part of a pretreatment compliance inspection (PCI) of the City. San Juan Fabrication and Powder Coating was previously inspected in 2017 and was determined to be a non-significant industrial user. The inspectors stopped by the facility unannounced on September 26th to conduct a facility inspection. However, at the time Mr. Welfelt was out town, and requested the inspectors return on September 27th to complete a walkthrough of the facility.

On September 27th, upon arrival at the facility at approximately 8:10 am, the inspectors conducted the opening conference, presented their inspector credentials, and explained the general purpose and procedures of the inspection. During the opening conference, Mr. Welfelt provided an overview of the facility's operations, including identification of any processes that have potential for spills and slug discharges.

Following the opening conference, Mr. Welfelt provided a walkthrough of the facility to visually review the unit processes discussed during the opening conference. To document and record the conversation and inspection observations, the inspectors took notes using checklists with questions applicable to the industrial user. Photographs taken during the inspection are included in the attached photo log.

EPA inspectors conducted a closing conference with Mr. Welfelt and provided general observations and preliminary findings from the inspection. The EPA and City representatives left the facility at approximately 8:45 am.

On October 12, 2023, the EPA sent preliminary findings from the inspection via email to Mr. Welfelt. Findings were primarily stormwater focused and reiterated in this inspection report.

1. What does this industry produce?

San Juan Fabrication and Powder Coating produces custom products (i.e., hand railings, stairs, wall art) according to customer specifications and orders. The facility conducts cutting, welding, fabrication, and powder coating unit processes.

2. How is the industry classified by the POTW?

The City previously classified San Juan Fabrication and Powder Coating as non-significant Industrial User (IU) and had not required a pretreatment industrial user permit for this facility.

3. Have there been any significant changes in processes or flow?

Since the last inspection at this facility in 2017, there have been no changes in the facility operations.

4. What raw materials are used?

The facility uses the following materials:

- Stainless steel
- Steel
- Aluminum
- Oil
- Synthetic cutting fluid (Kimball Midwest)
- Denatured alcohol

5. What processes are used to make the product(s)? Indicate any wastes generated and destination of wastes.

San Juan Fabrication and Powder Coating produces custom made products according to customer specifications. Raw materials including stainless steel, steel and aluminum, are received and proceed through either cutting, welding, fabrication or powder coating operations dependent on final product.

The fabrication process line uses small quantities of cutting oil/fluid in the fabrication machines and then weld together parts to form final product. A 5-gallon container of synthetic cutting oil used in the machines is stored in the shop (photo 568), no wastewater is used or discharged from this process line.

Following fabrication, products requiring powder coating are first transported to the sand blasting booth located outside behind the main shop. Coal slag is used in sandblasting to remove any burrs, rust, or previous finishes. Parts are then transported to the powder coating booth located in an adjacent building behind the main shop. Products are cleaned by spraying with denatured alcohol and then wiped down with wipes which are disposed of in the trash. A 5-gallon bucket of denatured alcohol is shown in photo 569. Parts are placed in the powder coating booth (photo 571), and negatively charged as powder coating is applied. The parts are then sent to the oven to cure the powder coat finish (photo 572). Finished products are then delivered to customers. No acid wash or phosphate wash is conducted, and no wastewater is used or discharged from this process line.

6. Where is water used and what is the source of the water (city, well, river, etc.)?

The facility is provided water from the City for domestic uses only. No process operations require water.

7. Describe the processes which discharge wastewater.

The facility does not discharge any process wastewater, only domestic wastewater is discharged.

8. Describe the sample location. Are the CA and industry using the same location?

Based on review and prior inspections, the City determined that San Juan Fabrication and Powder Coating does not need a pretreatment industrial user permit, and therefore does not conduct any wastewater sampling.

9. Describe the treatment system in place.

N/A. The facility does not discharge any process wastewater, only domestic wastewater is discharged.

10. What chemicals are maintained at the facility? How are they stored? Is adequate spill prevention in place?

The facility stores only small quantities of chemicals on site including: 5 gallons of synthetic cutting oil (Kimball Midwest) (photo 568), and 5 gallons of denatured alcohol (photo 569). A 55-gallon drum of used oil was place outside and collected any spent oil from operations, and properly disposed of offsite.

In addition, in the back of the facility outside between the sandblast booth and the powder coating booth, the facility has a 100-gallon diesel fuel storage tank (photo 570). There was no secondary containment observed for the diesel tank. Several gasoline containers were also observed on the ground near the fuel tank. Inspectors recommended any small gasoline containers be stored inside, or properly dispose of used containers.

11. Are any hazardous wastes stored or discharged?

Representatives indicated that no hazardous wastes are stored or discharged from the facility.

FINDINGS AND CORRECTIVE ACTIONS

The following findings were identified during the inspection. The EPA has requested the City work directly with San Juan Fabrication and Powder Coating to oversee correction of these items. No response from San Juan to the EPA is requested at this time.

Finding 1 – No secondary containment for outdoor diesel fuel storage tank.

A 100-gallon diesel tank is located outside behind the machine shop, between the powder coating building and the sand blasting booth. The tank is elevated on a stand; however, no secondary containment was present (photo 570). In addition, two discarded empty 5-gallon gasoline fuel containers were in the area.

Pretreatment Requirements

None – not permitted IU.

Corrective Action

On October 12, 2023, inspectors sent preliminary findings to Mr. Welfelt recommending a secondary containment structure be provided to prevent any potential stormwater runoff concerns should a spill or failure of the fuel tank occur. Also recommended to store gasoline containers inside the buildings or properly dispose of old containers.

Finding 2 – Spent coal slag from the sand blasting booth was on the ground outside the enclosed sand blasting booth.

During inspection of the outside process area, spent coal slag from the sand blasting booth was observed extend from the booth area into the common walkway and surrounding area, which could runoff during precipitation events.

Pretreatment Requirements

None – not permitted IU.

Recommendations:

On October 12, 2023, inspectors sent preliminary findings to Mr. Welfelt recommending routine cleaning of sand blasting booth to ensure spent media, residual coal slag (Black Magic), is contained within the sandblasting booth. Keeping the powder within the sand blasting booth and proper disposal of spent media prevents any potential stormwater runoff.