

**REPORT OF INDUSTRIAL USER AND INDUSTRIAL STORMWATER COMPLIANCE
SAMPLING INSPECTION**

**AT
Timken SMO LLC
4505 Campbell Dr.
Fort Scott, Kansas 65807**

**KANSAS PRETREATMENT PERMIT: KSP000115
STORMWATER PERMIT: KSR001126**

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

**ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION
December 12, 2023**

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, Water Branch, I conducted an industrial user compliance sampling inspection at Timken SMO LLC in Fort Scott, Kansas, on December 12, 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

Timkin SMO LLC (Timkin):

Erin Simonds, EHS Analyst, 620-768-5068, erin.simonds@timken.com

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

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

FACILITY DESCRIPTION

Timkin manufactures rubber transmission belts for commercial applications. The operations consist of rolling several layers of rubber and corded fabric to make the belt. The belt is cured, cut to specifications required by their clients, and then is shipped to the client.

This facility is subject to the Rubber Forming Standard for New Sources, 40 CFR Part 428.76.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced at approximately 12:20 PM on December 12, 2023. I then introduced myself and presented my credentials to Ms. Simonds. I explained the purpose and procedures of the inspection. I then

conducted the physical inspection of the facility and took grab samples at each of the four outfalls that generate process wastewater at the facility. I completed the Region 7 Industrial User Inspection Checklist during my inspection (attachment 1). Photos taken during my inspection can be found in attachment 2.

SAMPLING PROCEDURES:

On December 12, 2023, grab samples were taken from Outfalls 001, 002, 003, and 004. The effluent grab samples were collected into clean containers for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. The grab samples that were collected, were analyzed for lead (Pb), oil and grease (O&G), pH, and temperature values. The temperature and pH analysis 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 for Timkin became effective on January 1, 2023, and will expire December 31, 2028 (attachment 3). The permit requires the facility to monitor its effluent for flow, pH, and O&G. The permit also states that the facility must monitor for lead unless they certify during the submittal of their monitoring reports that lead sheath belts were not produced during the reporting period. The permit also places numerical limitations on those parameters. The permit further requires the facility to sample and analyze the parameters on a quarterly basis and submit discharge monitoring reports (DMRs) to the Kansas Department of Health and Environment on a semi-annual basis, by January 28 and July 28 of each year.

Ms. Simonds described Outfalls 001 and 002 as contact cooling water from quench tanks associated with the curing process, while Outfalls 003 and 004 are contact cooling from cutting tools. The outfall locations and wastewater flow paths can be seen in the Wastewater Discharge Drawing, found in the facility permit. They stated that nothing is added to the water during the contact cooling process. They also stated that all rubber used at the facility is brought in from another facility.

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last five reporting periods (January 2021 through June 2023,). The facility's last five reports can be found on the ECADs electronic file management system. The facility did not have any effluent exceedances during this period.

3. Water Balance: A water balance was achieved during the inspection. Timkin provided their method to determine the amount of water used at the facility (attachment 4). According to facility personnel, water is used in several applications, including contact cooling, non-contact cooling, reverse osmosis, steam generation, and sanitary wastewater. Water is metered as to what comes into the facility via the city water main. According to the facility's estimation process, the long-term water usage average is 1.9 million gallons per month. The facility utilizes approximately 900,000 gallons per month in generating steam, which they believe 60% is condensed and directed to the sanitary sewer and 40% is evaporated. The facility also estimates 1,000,000 gallons per month is used between the cooling water, cutter water, and sanitary sewer, and that they have a 6-month average

water loss of 1,200 gallons per month. Timkin then estimates that each outfall discharges approximately 12,816 gallons per day.

The water usage estimates that facility personnel provided balances out, however it does not accurately account for the discharges from Outfalls 003 and 004. During the inspection and observations made at the outfalls, it was clear that water usage at these outfalls was well below the 12,816 gallons per day reported on the DMRs. The facility does not have flow meters on each outfall and is not required to by their permit, thus the facility averages out each outfall in the facility.

4. Facility Closure: During my inspection, Ms. Simonds explained that the facility was currently ramping down production, with of their production lines having already been removed from the facility. Ms. Simonds explained that the Ft. Scott plant’s production was being moved to another facility in Mexico, and should completely cease operations by late 2024 or early 2025.

5. Spill Control Plan: The facility does have a Slug/Spill Control Plan. During the inspection, multiple spill kits were observed throughout the facility. I determined that the potential for spilled chemicals to enter the sanitary sewer system was minimal.

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.

Table 1. Analytical Results for Effluent Samples Collected During Inspection

Parameter	Outfall 001	Outfall 002	Outfall 003	Outfall 004	Limits
O&G (mg/L)	ND	ND	16.7	64.7	100
PB (mg/L)	ND	ND	ND	1.17	Monitor
pH (S.U.)	7.05	7.04	7.05	7.53	5.0-10.0
Temp (°C)	28.0	23.3	15.9	19.4	NA

- 1 Permit limits are daily maximums. Permit limits for pH are minimum followed by maximum
- 2 “ND“ denotes a non-detect result

Results of the sampling indicate that the facility did not have any exceedances at the time of inspection.

7. Storm Water: During the inspection, I observed the facility’s stormwater system (photos 1-8). The facility is required to obtain coverage under the KDHE Stormwater Runoff from Industrial Activity General Permit due to their Standard Industrial Code (SIC) 3052. The facility has obtained coverage under Federal Permit #KSR001126. At the time of inspection, Ms. Simonds provided, and I reviewed, a copy of the facility’s Stormwater Pollution Prevention Plan (SWPPP) at the time of inspection. An electronic copy of the SWPPP was provided to me after the inspection (attachment 11). The copy provided is undated, but has a signed certification date of April 20, 2022.

At the time of inspection, I found the SWPPP to be over all adequate with the exception of the site map required by the general permit. At the time of inspection, the site map showed stormwater flow

paths, but did not include any other items required by section 2.4.2(b) of the general permit (attachment 6). This was noted as item #1 on the Notice of Preliminary Findings that was left on-site after the inspection. When I received the SWPPP electronically after the inspection, the site map attached to the plan include the majority of the items required by the permit. The site map was still missing the map scale, stormwater conveyances, name of first body of water discharged to, scrap yards and general refuse areas, and a second outfall for the facility's parking lot. The facility shows one outfall (001) that collects stormwater from the majority of the facility. The facility's employee parking lot is downstream of this outfall and is not included in the stormwater drainage area for outfall 001.

8. Summary: During the exit meeting on December 12, 2023, I went over the facility's rights to claim confidential business information. The facility did not make any claims of confidentiality (attachment 7). During the exit briefing I issued a NOPF for the following (attachment 8):

- 1) Update SWPPP site map as required by general permit.

**BRIAN
D'ALFONSO**
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D'ALFONSO
Date: 2024.02.05
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Brian D'Alfonso
Life Scientist

**JODI
BRUNO**
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Jodi Bruno
Branch Manager, ECAD/WB

Attachments:

1. Region 7 Industrial User Inspection Checklist (6 pages)
2. Photo Log (9 pages)
3. Pretreatment Permit (13 pages)
4. Water Usage Information (1 page)
5. Data Transmittal Packet for Activity BOD2403 (15 pages)
6. KDHE Stormwater Runoff from Industrial Activity General Permit (57 pages)
7. Signed Confidential Business Information Form (4 pages)
8. December 12, 2023, NOPF (1 pages)