REPORT OF COMPLIANCE SAMPLING INSPECTION (CSI) & INDUSTRIAL STORMWATER

COMPLIANCE EVALUATION INSPECTION (CEI)

AT

Camso Manufacturing USA, Ltd.
2925 Industrial Street
Junction City, Kansas 67063

Federal Permit No.: KSP000119

Stormwater Authorization No.: KSR000879

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION

ON
July 18, 2023

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, Water Branch, I conducted a Compliance Sampling Inspection and an Industrial Stormwater Compliance Evaluation Inspection at Camso Manufacturing USA, Ltd. on July 18, 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

Camso Manufacturing USA, Ltd.
Jason Harris, Health and Safety Manager, 785-477-6783, jason.harris@michelin.com
Chance Bentley, Environmental Engineer, 785-340-5633, chance.bently@michelin.com
Dave Sinclair, Reliability Manager

U.S. Environmental Protection Agency (EPA), Region 7
Brian D'Alfonso, Biologist, 913-551-5095, dalfonso.brian@epa.gov

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced on the morning of July 18, 2023, introduced myself, presented my credentials to Messrs. Harris, Bentley and Sinclair. I completed the Region 7 Industrial User Checklist (attachment 1) and then conducted a walk-through of the manufacturing process, concentrating on the wastewater generation process and stormwater. Photos were taken during my inspection (attachment 2) An exit briefing was conducted with Messrs. Harris and Bentley prior to leaving the facility.

FACILITY DESCRIPTION

The Camso Manufacturing facility manufactures rubber tracks for agriculture equipment. Raw materials utilized in the manufacturing process consist of rubber, cable, adhesives and additives. Raw rubber is extruded on-site, assembled into tracks with cables and additives, cured in hot water, inspected and packaged for shipment.

The facility has two designated outfalls according to the facility's Kansas Department of Health and the Environment (KDHE) Pretreatment Permit (attachment 3). The regulated wastewaters from the facility consist of wastewater generated from the curing of the rubber tracks. The facility has two curing vessels, which each discharge as outfall 001A and 002A.

The only treatment process conducted prior to discharge is the addition of potable water to adjust wastewater temperature.

The facility is subject to the 40 C.F.R. Part 428.76, Rubber Forming Standards for new sources. The facility has an SIC code of 3061, as listed in their pretreatment permit.

SAMPLING PROCEDURES

The facility discharges process wastewater daily during production operations, and the facility discharged from one of the vessels at the time of my inspection. Grab samples from both outfalls were collected at the time of inspection, although these outfalls were not at the point of discharge from the vessels (as discussed below). The sample collection locations are on a water line that is connected to one of two water towers (one for each vessel) that feeds the vessels and stores the water with additives for the next curing process. The effluent samples were preserved as appropriate and packed with ice to maintain a temperature below 4°C.

After the samples were collected, I placed the samples I collected on ice in an insulated cooler, sealed the container, and shipped it overnight to the EPA Region 7 Science and Technology Center's laboratory for analysis. 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. A summary of the results from the sample analysis are provided below in Section 7 (Sample Results) of this report.

On July 18, 2023, I collected grab samples from outfalls 001A and 002A. I collected adequate volumes of sample using a glass sampling container and poured them into clean, pre-labeled polyethylene containers for the analysis of oil and grease (O&G) and metals, including lead (Pb). At the time of sampling, I preserved the O&G samples with hydrochloric acid, and the metals samples with nitric acid. I collected a separate grab sample from the same location to measure pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. The pH result collected from Outfalls 001A and 002A, were recorded at 10.05 S.U. and 10.19 S.U., respectively. The temperature of the effluent from the same outfalls was measured at 29.7°C and 32.0°C, respectively.

FINDINGS AND OBSERVATIONS

1. Permit: A KDHE Pretreatment Permit issued to Camso Manufacturing USA, Ltd. became effective on October 1, 2022, and will expire December 31. 2024 (Attachment 3). The permit requires the facility to monitor its effluent for flow, pH, O&G and PB. The facility has a permitted limit for O&G and pH. The limits are 100 mg/L and 5.0-10.0 S.U, respectively. The permit further requires the facility to sample and analyze the parameters on a daily, weekly and/or quarterly basis and submit discharge monitoring reports (DMRs) to the KDHE on a semi-annual basis, by January 28 and July 28 of each year.

The facility's permit lists two outfalls that are required to be sampled (Outfalls 001A and 002A), using a grab sample technique. The permit requires that, *"All wastewater samples shall be collected of process wastewater immediately following the curing vessels, before the regulated waste stream combines with domestic wastes from restrooms and boiler blowdown."*

The facility was last inspected by KDHE on August 13, 2019 (attachment 4). The facility was new and had not begun production at the time of the inspection, thus no violations were found as a result of the inspection. The inspection report listed five "conclusions/recommendations" determined by the inspection.

2. Plant Operations: The facility operates 24/7 with three shifts Monday-Friday and two shifts on Saturdays and Sundays. At the time of inspection, facility personnel stated the facility had 203 employees.

3. Discharge Monitoring Reports: I reviewed the facility's DMR compliance status from January 2021 through July 2023. I found that the facility exceeded their pH limit one time on May 24, 2023. The facility had a reading of 11.24 at outfall 002A, which exceeded their pH range of 5.0-10.0. The facility was issued a Notice of Violation (NOV) from KDHE (attachment 5).

The facility self-notified on June 26, 2023 (Attachment 6) that they had missed two pH samples in December 2022, due to a change in employees.

In the second half of 2021, the facility was issued a NOV from KDHE for failing to collect their O&G sample (attachment 7).

4. Water Balance: The facility submitted a water balance worksheet that they had conducted for KDHE (attachment 8). The worksheet shows that the facility uses 8000 gallons of water purchased from the city each day. They reported 6200 gallons of process wastewater, which is in line with their reported flows on their DMRs. They also reported 1200 gallons of sanitary wastewater which within the range of 5 to 25 GPD which is considered normal domestic usage. The remainder of the water used at the facility is lost through evaporative loss, used in boilers and a minimal amount used for cleanup.

5. Solvent Management Plan: Because the facility is not subject to the Metal Finishing standards, they are not required to have a solvent management plan.

6. Wastewater Treatment: The facility does not treat their wastewater discharges with the exception of adding potable water to lower the temperature of the water prior to discharge. The facility does not have a limit for temperature in their permit, and the lowering of the temperature appeared to be conducted for the purpose of sample handling (to prevent burns).

7. Sample Results: Analytical results of the effluent samples collected during this inspection are provided in Table 1 below. Complete analytical results from the inspection are included in Attachment 9.

As described in attachment 9, for results followed by a J, the analyte is acceptable; the reported value is an estimate. For results followed by an L, the quantitation is biased lower due to the results being outside the range of the dilutions performed, thus the actual values are expected to be higher than the reported values.

Table 1. Analytical Results for Effluent Samples Collected During Inspection at Outfall 001

Parameter	(July 18) Outfall 001A	(July 18) Outfall 002A	Permit Limits[1](mg/L)
O&G (mg/L)	20.0J	22.1	100
PB (mg/L)	ND	ND	ND
pH (S.U.)	10.05	10.19	5.0-10.0
Temp (°C)	29.7	32.0	NA

1 Permit limits for O&G and PB are daily maximums. Permit limits for pH are minimum followed by maximum.
2 "ND" denotes a non-detect result

EPA sample results from the inspection showed permit exceedances for pH at both outfalls on the day of sampling.

As previously discussed, my samples were taken from the same point that the facility samples for both outfalls. These locations are both "sampling ports" in the water piping that goes from two water towers (one for each vessel) to each curing vessel (photo 3). After discussing the locations with facility personnel, it was determined that discharges from the curing vessels do not flow to, and can not be collected, at these sample ports. During my inspection, I observed a discharge from curing vessel 2. This discharge flowed directly from the bottom of the vessel to a floor drain.

In section A of the facility's permit under "Sampling/Monitoring Location(s)", the permit requires that *"All wastewater samples shall be collected of process wastewater immediately following the curing vessels, before the regulated waste stream combines with domestic wastes from restrooms and boiler blowdown."* At the time of the inspection, it appeared that the facility was not sampling immediately following the curing vessels. This was noted as part of the first item on the Notice of Preliminary Findings (NOPF) that was provided to the facility after the inspection (attachment 10). Facility personnel explained during the inspection that the sampling points were determined with KDHE personnel prior to the facility's permit being issued. An adequate sampling site is briefly discussed in KDHE's 2019 inspection report. The report states a location for sampling was located, but it does not describe the specific spot for sampling.

After determining that the facility is not sampling directly after the vessel, I asked facility personnel if they ensured the vessels were discharging. They stated they were not because they could collect a sample during or after a discharge. This was noted as part of the first item on the NOPF that was

provided to the facility after the inspection.

8. Stormwater: During the inspection, I observed the facility's stormwater system. The facility has a Non-Exposure Certification from KDHE, so they are not required to have a Stormwater Pollution Prevention Plan. While conducting my inspection of the exterior of the facility, I found that the facility was washing tracks outside with a pressure washer (photos 5-8). The facility was using a degreasing agent, Talon All Purpose Degreaser (attachment 11 & photo 4) with the power washer. According to facility personnel, this process had begun approximately two weeks prior to my inspection due to a residue being left on the tracks from an issue with the curing process. I explained to the facility personnel that this process could be considered a discharge of process wastewater and would most likely require a permit. This was noted as the second item on the NOPF that was provided to the facility after the inspection.

Also, while conducting my inspection of the facility's exterior, I observed a pile of off-spec cable that was being stored outside (photo 9). I explained to the facility personnel that since they have a non-exposure certificate, they are not allowed to store this material outside in the open. This was noted as the third item on the NOPF that was provided to the facility after the inspection.

9. Summary: During the exit briefing on July 18, 2023, I went over the facility's rights to claim confidential business information (CBI). A CBI form was provided to facility personnel by email after the inspection. The facility returned the form making a claim of confidentiality (attachment 12), covering the layout of the facility and photos of the "outfalls and water sample draw locations." During the exit briefing I discussed my inspection findings with facility personnel. I provided the facility with a NOPF by email after the inspection, and it was signed and returned (attachment 10). The NOPF list the following findings:

1) Ensure the facility is sampling from the correct location and during discharges.

2) Facility is washing tracks outside, creating an un-permitted discharge of wash water.

3) Facility is storing off-spec cable outside and has a non-exposure certificate.

The facility responded to the NOPF on July 27, 2023, via e-mail, addressing the preliminary findings observed during the inspection (attachment 13). The facility's response addressed each of the original findings.

BRIAN D'ALFONSO
Digitally signed by BRIAN D'ALFONSO
Date: 2023.10.10 10:15:06 -05'00'

Brian D'Alfonso
Life Scientist, WB/DWIS

NICOLE MORAN
Digitally signed by NICOLE MORAN
Date: 2023.10.10 11:39:24 -05'00'

Nicole Moran
Section Chief, WB/DWIS

Attachments:
1. EPA Industrial User Inspection Checklist (6 pages)
2. Facility Photos (10 pages)
3. Oct 1, 2022, KDHE Pretreatment Permit (17 pages)
4. August 13, 2019, KDHE Inspection Report (4 pages)
5. July 31, 2023, KDHE NOV (2 pages)
6. June 26, 2023, Self-Monitoring Semi-Annual Report (35 pages)
7. January 31, 2022, KDHE NOV (2 pages)

8. Water Balance (1 page)
9. Sample Analysis Results for Project BPD 2305 (17 pages)
10. July 19, 2023, NOPF (1 page)
11. Talon All Purpose Degreaser SDS (12 pages)
12. Confidential Business Information Form (4 pages)
13. July 27, 2023, Facility Response (3 pages)

United States Environmental Protection Agency – Region 7

Digital Image Log

1. Facility Name: Camso Manufacturing USA Ltd **2. FRS #: 110071358777**	**3. Inspector Name: Brian D'Alfonso**		
4. Photographer (if Different): Brian D'Alfonso	**5. Date of Inspection: 7-18-23**		
6. Street Address of Digital Images: 2925 Industrial Street, Junction City, KS	**7. City: Junction City**	**8. State: KS**	**9. Zip: 66441**
10. Image Numbers: DSCN3454-4362	**11. File Name: IR_PhotoLog_FY23_KS_CamsoMfg**		

Weather: at 15:00

Temperature	Humidity	Wind Direction	Wind Speed	Sky Condition
NA	NA	NA	NA	Sunny, Partly Cloudy

Digital Image Number	File Name	Description	Date and Time Digital Image Taken
1	DSCN4354.JPG	Discharge from cooling vessel directly into floor drain. Sampling DOES NOT occur here	2023:07:18 15:02:54
2	DSCN4355.JPG	Sampling port. The sampling port for outfall 001. Not connected to discharge from cooling vessel, but connected to water tower 1.	2023:07:18 15:03:41
3	DSCN4356.JPG	Water towers used for cooling vessels behind facility.	2023:07:18 15:10:24
4	DSCN4357.JPG	Degreaser used in power-washer for cleaning process in photo 5.	2023:07:18 16:02:24
5	DSCN4358.JPG	Area where tracks are power washed. Run-off to combine with stormwater in background.	2023:07:18 16:03:16
6	DSCN4359.JPG	Continuing photo from photo #5 showing where wash-water flows	2023:07:18 16:03:33
7	DSCN4360.JPG	Photo shows where wastewater from cleaning process collects before flowing off-site	2023:07:18 16:04:01
8	DSCN4361.JPG	Continuation of wash-water from photos 5, 6 & 7.	2023:07:18 16:04:07
9	DSCN4362.JPG	Stack of off-spec steel cable/wire being stored outside and exposed to stormwater.	2023:07:18 16:07:37

Number	Photo
1	Photo is possible CBI
	Discharge from cooling vessel directly into floor drain. Sampling DOES NOT occur here