

REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

AT

**Vollrath d.b.a. Carlson Products
9010 West 45th Street North
Maize, KS 67101**

KANSAS PRETREATMENT PERMIT: KSP000086

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

**Enforcement and Compliance Assurance Division
February 27, 2024**

INTRODUCTION

I conducted an Industrial User Compliance Inspection at Vollrath d.b.a. Carlson Products in Maize Kansas, on February 27, 2024. 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

Vollrath d.b.a. Carlson Products:

Mike Gribble, Engineering Quality Director

Email: michael.gribble@vollrathco.com

Eric Short, Operations Manager

Joan Gerard, EHS Manager for Vollrath (via telephone)

Tony Bibble, Environmental Manager (via telephone)

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

Joe Heafner, Life Scientist

Email: heafner.joseph@epa.gov

FACILITY DESCRIPTION

This facility is subject to the Metal Finishing Point Source Category, 40 CFR Part 433, because it performs anodizing of aluminum pizza pans, cooking sheets, and doors using two anodizing lines, one for type 2 (clear coat) and one for type 3 (dark coat) anodizing. The facility also performs fabrication of steel and stainless steel by stamping, cutting and welding; employs 54 persons; and currently operates 2 shifts, seven days per week.

Wastewater Generation and Treatment Processes: The two anodizing processes consist of a series of 14 cleaning, caustic, acidic dip, and rinse tanks (attachment 1). The water for the rinse tanks is produced from a reverse osmosis (RO) system. The dip tanks sit within a containment pit and the rinses are collected in a sump within the collection pit then pumped to a pretreatment system. The pretreatment system performs pH neutralization, flocculation to remove metals, and a filter press (attachment 2).

The pretreatment system discharges an average of approximately 14,500 gallons per day (gpd) to the City of Maize's sanitary sewer at a closed pipe on the floor near tank 3. This discharge point also includes RO reject water which does not go through the anodizing processes or pretreatment system. The sampling point for the pretreatment system is at a sampling port situated on the discharge line between tanks 2 and 3 and there is no flow meter on the pretreatment system.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility on the morning of February 27, 2024, introduced myself, presented my credentials, and explained the purpose and procedures of the inspection to the facility participants. I conducted the physical inspection of the facility and wastewater treatment that morning. I completed an Industrial User Inspection Checklist (attachment 3) and conducted an exit briefing.

SAMPLING PROCEDURES

On the morning of February 27, 2024, grab samples of the pretreated wastewater were collected from the sampling port between tanks 2 and 3 for determination of metals, pH, and temperature. The samples were collected directly into the sample containers and temperature and pH analyses were performed immediately on site. Samples were split with the facility for metals with containers and preservatives provided by EPA.

All samples collected were packed in ice then hand delivered to the EPA Region 7 Laboratory. Chain-of-custody procedures were used for all samples. All appropriate Region 7 standard operating procedures in the collection, packaging, transportation, and handling of the samples were followed.

FINDINGS AND OBSERVATIONS

1. Permit: A Kansas Pretreatment Permit was issued to Carlson Products On April 1, 2020 and will expire on March 31, 2025 (attachment 4). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, silver, zinc), total toxic organics (TTOs), and cyanide. 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 Dept. of Health and

Environment (KDHE) on a semi-annual basis, by January 28 and July 28 of each year.

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last four reporting periods (January 2022, July 2022, January 2023, and July 2023) which was provided electronically after the completion of the inspection. I reviewed the requested data and noted that the facility was in compliance for all four periods. After my review, I placed the requested data in the ECAD electronic file for the facility.

3. Water balance: An accurate water balance was not able to be achieved during the inspection. The facility utilizes water from a well on-site for the anodizing line and for the reverse osmosis system. Mr. Gribble provided the well meter readings for the past several months. I reviewed the readings and noted that they are the same numbers that are reported on the monthly DMRs. After the completion of the inspection, I contacted Mr. Gribble and he explained that the RO reject water was separated from the process wastewater stream several years ago, however, it still discharges to the sanitary sewer system through Outfall 001. He also stated that he had contacted KDHE and was informed that the current estimation of flow to Outfall 001 (process wastewater and RO reject water combined) was an acceptable method for measuring flow. Since there are no flow meters measuring the process wastewater flow or the RO reject water, an accurate amount of water to the sanitary sewer system cannot be measured or estimated.

4. Total Toxic Organics: The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics (TTOs) provided it is following the provisions of its approved Solvent Management Plan (SMP). The SMP was provided after the completion of the inspection and a copy is included as attachment 5. A review of the SMP revealed that the facility has small amounts of Toluene used in the paint prep and cleanup areas. These solvents are stored in the paint storage area of the facility. I noted that the SMP was last certified by the facility in 2020. After the review, I placed the copy of the SMP in the ECAD electronic file for the facility.

5. EPA Sample Results: Analytical results of the effluent samples collected during this inspection are provided in the table below and are included as attachment 5. I reviewed the effluent sample data in the table and found that there were not exceedances of effluent limits on the day of the inspection.

Sample Results For Carlson, mg/L

	Ag		Cd		Cr		Cu		CN		Ni		Pb		Zn		pH (s.u.)	
	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Min	Max
Outfall	0.43	0.24	0.11	0.07	2.77	1.71	3.38	2.07	1.2	0.65	3.98	2.38	0.69	0.43	2.61	1.48	5	10
001	ND		ND		0.0692		0.804		Not Sampled		0.0263		ND		0.115		8.52	
Result:	C		C		C		C		NA		C		C		C		C	

JOSEPH HEAFNER
 Digitally signed by JOSEPH HEAFNER
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 Joe Heafner
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Attachments:

1. Anodizing Lines Water Levels and Capacities (1 page)
2. Wastewater Treatment Diagram (1 page)
3. EPA Industrial User Inspection Checklist (6 pages)
4. Pretreatment Permit (16 pages)
5. Solvent Management Plan (4 pages)
6. EPA Sample Analysis Results for Activity JAH2412 (11 pages)