



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

Justin Yellow Horse
Maintenance City Worker
City of McLaughlin
mclughsd@heartlandpower.org

Re: Inspection Report for the City of McLaughlin Wastewater Treatment Facility, NPDES
Permit No. NDG589301

Dear Mr. Yellow Horse:

On July 13, 2022, representatives of the U.S. Environmental Protection Agency inspected the City of McLaughlin Wastewater Treatment Facility located in McLaughlin, 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 Standing Rock 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:

Emilio Llamozas
llamozas.emilio@epa.gov

Jake Luger
jluger@standingrock.org

Please contact me at 303-312-6407 or llamozas.emilio@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,

Emilio Llamozas
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

- 1) City of McLaughlin WWTF NPDES Inspection Report – Wastewater Treatment Facility
- 2) City of McLaughlin WWTF Photo Log
- 3) City of McLaughlin WWTF Schematic

cc: Jake Luger, Acting Environmental Director, Standing Rock Sioux Tribe (via email)

NPDES Inspection Report – Wastewater Treatment Facility

National Database Information	
Inspection Date: July 13, 2022	Inspection Type: CEI - Wastewater Treatment Facility
Entry/Exit Time: 8:05 am / 10:03 am	NPDES ID Number: NDG589301
NAICS Code: 221320	Inspection ID: 202207 NDG589301
Lead inspector and affiliation: Emilio Llamozas / EPA Region 8	
Inspector and affiliation: Stephanie Meyers / EPA Region 8	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: City of McLaughlin Wastewater Treatment Facility 106 1 st Ave West NW1/4 S6 T21N R27E McLaughlin, South Dakota 57642	Email Report to: Justin Yellow Horse and Nathan Thompson City of McLaughlin mclughsd@heartlandpower.org

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Justin Yellow Horse / Maintenance City Worker / City of McLaughlin / primary lead during the inspection
	Nathan Thompson / Wastewater Operator / City of McLaughlin / present during the inspection
	Kory Bauder / Maintenance City Worker / City of McLaughlin / present during the inspection
	Tyler Timmons / Tribal Utility Consultant / Indian Health Service (IHS) / present during inspection
Person/Company meeting definition of “Operator”	City of McLaughlin
Authorized Official(s) (Per NOI?)	Lornie Hach (retired) / Utility Manager / City of McLaughlin

Permit Information		
Is the permit on site and available? Yes	Lagoon Category: No Discharge	Monitoring Frequency: N/A
Effective Date: April 25, 2016	December 31, 2020 (Administratively Continued)	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Lornie Hach retired and the City is in the process of finding a replacement. When the new replacement is found, the City will notify EPA.	
Receiving Water(s): Unnamed tributary of Oak Creek		
Discharge point location (longitude, latitude): There is one emergency outfall at the northeast corner of the cell 3. Lat. 45.817887° N, Long. -100.824815° W.		
Regulatory Inspector’s source of information: Notice of Intent for the permit, ICIS database, permit, facility representatives and facility observations.		

Areas Evaluated During Inspection		
<u>Permit</u>	<u>Self-Monitoring Program</u>	Pretreatment
<u>Records</u>	Compliance Schedule	Pollution Prevention
<u>Facility Site Review</u>	Laboratory	Stormwater
<u>Effluent/Receiving Waters</u>	<u>Operations and Maintenance</u>	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	<u>Sanitary Sewer Overflow</u>

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Emilio Llamozas	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	08/10/2022
	303-312-6407	
Reviewer Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	08/10/2022
	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
 Digitally signed by Boeglin, Michael Date: 2022.08.11 07:54:07 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	08/11/2022
	303-312-6250	
Michael Boeglin		

Inspection Narrative and Site Description

The inspection was conducted at the McLaughlin Wastewater Treatment Facility (WWTF or facility) located on the Standing Rock Sioux Reservation, in McLaughlin, South Dakota 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 a month prior to the inspection, to coordinate logistics for the inspection. On July 13, 2022, U.S. Environmental Protection Agency (EPA) inspectors Emilio Llamozas and Stephanie Meyers met with Justin Yellow Horse, Nathan Thompson and Kory Bauder with the City of McLaughlin (City). The EPA inspectors presented their credentials and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to ask questions to the facility representatives to help the inspectors evaluate compliance with the facility's permit. The inspectors also reviewed the lagoon inspections, operation and maintenance manuals for the lift stations and the operation and maintenance logs for the lift stations and lagoons. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.

The City of McLaughlin WWTF serves approximately 663 people, a school, a gas station, an auto parts store, and one restaurant. The WWTF was originally built in 1960 and has been improved throughout the years. The last improvements were in 2013 to repair the side slopes of the south and east berms of cell 1. Wastewater is pumped via two lift stations, the East lift station (photo 92), located on the east side of the City and the West lift station (photo 95) located next to cell 1 of the lagoon. Wastewater from the east side of the City flows to the East lift station, which is then pumped into the West lift station. The West lift station then pumps the wastewater into cell 1. The West lift station has a pipe, which allows the wastewater to flow into cell 2 via gravity, if a bypass from cell 1 is needed (photo 94). Wastewater gravity feeds in series from cell 1 (photo 96) to cell 2 (photo 97) to cell 3 (photo 98) through valve controls. Cell 3 has an outfall on the northeastern corner and only discharges in emergency conditions into Oak Creek. See the enclosed facility schematic and flow diagram. The McLaughlin WWTF is authorized as a "No Discharge" facility under the NPDES General Permit for wastewater systems on the Standing Rock Reservation. The table below has the operating volume for the three cells.

Cell ID	Area (acres)	Operating Depth (feet)	Operating Volume (MG)
Cell 1	11.05	5	17
Cell 2	5.37	5	8.06
Cell 3	5.60	4	6.84
Total	22.02	-	31.9

The average design flow to the facility is 0.104 million gallons per day (MGD) and the peak design flow is 0.137 MGD. The facility accepts hauled septic waste from one hauler (Randy Carlson from Mobridge, South Dakota). The septic hauler pumps the septic tanks for the grain elevator located in the City of McLaughlin. The septic receiving station is on the north side of cell 1.

Dakota Pump and Control performs maintenance on both lift stations twice per year. The facility representatives indicated that no sanitary sewer overflows (SSOs) have occurred at the lift stations. Facility representatives indicated that they have a separate collection system between wastewater and stormwater. The sanitary sewer collection system was last upgraded in 2016, where sewer lines were

aligned and relined. Jetting operations of the wastewater collection system are performed in the fall of each year. In June 2022, there was a blockage in the wastewater collection system at 5th Street and Main Street due to sanitary wipes from the McLaughlin Indian Health Center. The facility representatives were able to use the City's jetter to remove the blockage. The facility representatives indicated that there was no sanitary sewer overflows from the June 2022 wastewater collection system blockage.

The inspectors first observed the East and West lift station (photos 91-95). The operators were keeping track of the lift stations' pump hours (photo 91 and 93). Below are the coordinates for the East and West lift stations.

Lift Station Name	Latitude	Longitude
East lift station	45.811379° N	-100.805388° W
West lift station	45.814632° N	-100.819276° W

During the inspection, wastewater was flowing from the West Lift Station into cell 1 for treatment (photo 96). The wastewater is then routed to cell 2 (photo 97). The wastewater can then be sent to cell 3 (photo 98). Wastewater was not flowing into cell 3 at the time of the inspection. The facility representatives indicated that they have not had to discharge from cell 3. If there was an emergency discharge, it would flow to an unnamed tributary of Oak Creek (photo 99).

The inspectors and facility representatives drove around the lagoons to evaluate berm integrity and the facility's discharge status. Vegetation had reached a height greater than six inches on the inside berm (riprap) of cell 1, cell 2 and cell 3 (photos 96-98). The inside of cell 3 had vegetation that had reached greater than six inches in height and needed to be mowed (photo 98). The facility representatives indicated that there were several recent precipitation events and that they were waiting for the bottom of cell 3 to dry out before mowing it.

On July 13, 2022, the inspectors returned to the City of McLaughlin main office and held a closing conference with Mr. Yellow Horse, Mr. Thompson and Mr. Bauder where preliminary findings were discussed. On July 21, 2022, the EPA sent an email to Mr. Yellow Horse, Mr. Thompson and Mr. Bauder with the preliminary findings from the inspection.

Findings, Corrective Actions and Recommendations

Finding #1: Weekly lagoon inspections were not being conducted.

Weekly lagoon inspections were not being conducted in 2022. Some weekly lagoon inspections were missed in 2020 and 2021. The inspectors provided the facility representatives with a lagoon inspection report template form that the facility representatives could use to document the weekly lagoon inspections.

Below are the lagoon inspection dates for 2020:

January 6, 13, 20, and 27;

February 3, 10, 17 and 24;

March 2, 9, 16, 23, and 30;

April 13, 20, and 27;

May 4, 11, 18, and 25;

June 15, 22, and 29;

July 6, 13, 20, and 27;

August 3, 10, 17, 24, and 31;

September 8, 14, 21, and 28;

October 19;

November 2, 9, 16, and 23; and

December 7, 13, 20 and 27.

Below are the lagoon inspection dates for 2021:

January 4;

May 17 and 24;

June 7;

September 20 and 27;

October 4, 11, and 25;

November 1, 8, 15, and 29;

December 6, 13, and 20.

Permit requirement:

Part 4.3.1 of the Lagoon General Permit (Permit) states, "On at least a weekly basis, unless otherwise modified by written approval from the EPA, the permittee shall inspect its wastewater treatment facility. The permittee shall maintain a notebook recording all information obtained during the inspection. At a minimum, the notebook shall include the following:

4.3.1.1. Name of facility and permit number;

4.3.1.2. Date and time of the inspection;

4.3.1.3. Name of the inspector(s);

4.3.1.4. The facility's discharge status;

4.3.1.5. The flow rate of the discharge if occurring;

4.3.1.6. If a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Parts 3.2 and 5.4 of this permit if not already done.);

4.3.1.7. Is there is any leakage through the dikes;

- 4.3.1.8. Are there any animal burrows in the dike;
- 4.3.1.9. Is there any erosion of the dikes (e.g., rills, cracks or other structural indications of erosion);
- 4.3.1.10. Are there any rooted plants, including weeds growing in the water;
- 4.3.1.11. Does the vegetation growth on the dikes need mowing (e.g. greater than 6" tall);
- 4.3.1.12. List the date scheduled for operation and maintenance procedures to be undertaken at the wastewater treatment facility.
- 4.3.1.13. Identification of operational problems and/or maintenance problems;
- 4.3.1.14. Recommendations, as appropriate, to remedy identified problems;
- 4.3.1.15. A brief description of any actions taken with regard to problems identified; and,
- 4.3.1.16. Other information, as appropriate.

The permittee shall maintain the notebook in accordance with required record-keeping items listed above and shall make the log available for inspection, upon request, by authorized representatives of the U.S. Environmental Protection Agency or the applicable Tribe (see Part 5.10 of this permit)."

Part 5.7 of the Permit states, "The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, inspection records, notifications to the EPA per this permit, and DMRs, for a period of at least five years from the date of the sample, measurement, report, application or submittal. Records of monitoring required by this permit related to sludge use and disposal activities must be kept at least five years (or longer as required by 40 C.F.R. Part 503). This period may be extended by request of the Director at any time. Data collected on site, data used to prepare the DMR, copies of DMRs, a copy of this NPDES permit, and the notice of intent for permit coverage, must be maintained on site."

Corrective Action:

Ensure that inspections are conducted on a weekly basis and documented in accordance with the permit. Ensure that inspection reports are kept in accordance with the recordkeeping requirements of the permit. Provide the EPA, the Standing Rock Sioux Tribe Environmental Program (Tribe) and IHS with a description of the corrective actions taken to address this finding.

Finding #2: There was vegetation growing on the inside riprap berms of cells 1, 2 and 3 and on the inside of cell 3.

Vegetation had reached greater than six inches in height on the inside berm (riprap) of cells 1, 2 and 3 that needed to be cut (photos 96-98). The inside of cell 3 had vegetation that had reached greater than six inches in height and needed to be mowed (photo 98). The facility representatives indicated that there were several recent precipitation events and that they were waiting for the bottom of cell 3 to dry out before mowing it.

Permit Requirement:

Part 6.5 of the Permit states, "Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to

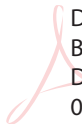
achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance. In addition to the operation and maintenance items in the manual for the lagoon system, the permittee shall do the following maintenance:

- 6.5.1. Take necessary action to promptly correct the problem of leakage through the dikes;
- 6.5.2. Take necessary action to promptly remove burrowing animals from the dikes;
- 6.5.3. Promptly repair damage to dikes caused by burrowing animals and/or erosion;
- 6.5.4. Remove rooted plants, including weeds, from the water on a regular basis or as needed; and
- 6.5.5. Keep the dikes mowed on a regular basis during the growing season or as needed (e.g., keep growth below 6" in height)."

Corrective Action:

Remove the overgrown vegetation growing on the inside berms of cells 1, 2 and 3 and on the inside of cell 3. Submit to the EPA, the Tribe and IHS photos of the cells after the vegetation and trees have been removed.

NPDES Inspection Report – Industrial User

Name of industry and location:	Control authority / Permit No. / Facility ID:	
Finishing Lab, LLC 619 North Church Avenue Unit 4 Bozeman, Montana 59715	City of Bozeman Permit No. 106 NPDES ID: MTPU00122 Inspection ID: 202208_MTPU00122 NAICS Code: 332813 – Electroplating, Plating, Polishing, Anodizing and Coloring Latitude: 45.686404°N, Longitude: -111.030578°W	
Date of visit:	Time of visit:	
August 18, 2022	10:00 am – 12:05 pm	
Name(s) / Affiliation of inspector(s):		
Emilio Llamozas / U.S. Environmental Protection Agency, Region 8 (lead) Lisa-kay Prideaux / U.S. Environmental Protection Agency, Region 8 Mark DeWald / City of Bozeman		
Name / Title / Affiliation:		
Matt McCune / Owner / Finishing Lab, LLC Allison Phillips / Operations Manager / Finishing Lab, LLC		
Report Review and Signature		
Drafter Name	Address/Phone Number	Date
EMILIO LLAMOZAS  Digitally signed by EMILIO LLAMOZAS Date: 2022.09.16 08:53:43 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/08/2022
	Emilio Llamozas 303-312-6407	
Reviewer Name	Address/Phone Number	Date
Lisa-kay Prideaux	U.S. EPA Region 8 Helena Office 10 W 15 Street, Suite 3200 MO-309 Helena, Montana 59626	9/14/2022
	406-457-5022	
Supervisor Signature/Name	Address/Phone Number	Date
Boeglin, Michael  Digitally signed by Boeglin, Michael Date: 2022.09.16 08:45:31 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/16/2022
	Michael Boeglin 303-312-6250	
Inspection Description:		
On August 18, 2022, U.S. Environmental Protection Agency (EPA) inspectors Emilio Llamozas and Lisa-kay Prideaux (jointly referred to as inspectors) and the City of Bozeman (City) inspector Mark DeWald conducted		

an industrial user inspection of Finishing Lab, LLC (Finishing Lab or facility) in Bozeman, Montana as part of a pretreatment compliance inspection (PCI) of the City. The City had identified Finishing Lab as a Categorical Industrial User (CIU) permitted to discharge to the City's sanitary sewer system under Permit Number 106 (permit). The inspection was announced to Finishing Lab the morning of the inspection.

Upon arriving to the facility at approximately 10:00 am, Mr. DeWald introduced the inspectors to the Finishing Lab representatives Matt McCune, Owner, and Allison Phillips, Operations Manager. The inspectors began the opening conference by presenting their credentials and explaining the general purpose and procedures of the inspection. During the opening conference, Ms. Phillips provided an overview of the facility's operations, focusing on the processes that generate wastewater and the wastewater pretreatment system (neutralization and chemical precipitation for nickel).

Following the opening conference, Mr. McCune and Ms. Phillips accompanied the group of inspectors on a facility walkthrough, with focus placed on the anodizing process line, chemical and waste storage areas, pretreatment system and sampling point. To document and record 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. McCune and Ms. Phillips and provided general observations and preliminary findings from the inspection. The EPA and City representatives left the facility at approximately 12:05 pm.

1. What does this industry produce?

The facility is an metal finishing facility that performs type II anodizing of aluminum parts for different customers, which includes a variety of products from fishing reels to small machine parts.

2. How is the industry classified by the POTW?

The City classified Finishing Lab as a Categorical Industrial User (CIU) because the facility is a metal finisher subject to the metal finishing categorical industrial user standards found at 40 C.F.R. 433.17. The facility was classified as a new source because it began operations in December 2020, which is after the new source date for metal finishers of August 31, 1982. The facility was previously doing business as Auto Pilot. However, Auto Pilot is now a separate machine shop.

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

No changes have occurred at the facility since Finishing Lab started operations in December 2020.

4. What raw materials are used?

The facility uses the following materials:

- 6061 aluminum alloy.
- Sodium hydroxide for neutralization and etching of aluminum parts.
- Different colors of dyes (black, purple, red, orange, gray and blue).
- Sulfuric acid used as a deoxidizer. It is also used in the anodizing tanks.

- Nickel base sealant.

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

The different aluminum parts received from customers are mounted on titanium racks. Then they are anodized in the following tanks manually by operators. Tank 1 has a cleaner where parts are immersed for approximately three minutes (photo 1). Tank 2 is a rinse tank with reverse osmosis (RO) water where parts are rinsed for approximately five minutes. The facility has a RO system (photo 16) to purify the water that is used in the rinse tanks. Tank 3 is the etch tank (photo 1), which contains sodium hydroxide where parts are dipped for approximately 45-90 seconds. Tank 4 has RO rinse water where parts are rinsed for approximately five minutes. This tank has an overflow on the back of the tank. Tank 5 is the deoxidizer tank, which contains sulfuric acid where parts are dipped for approximately five minutes. Tanks 6 and 7 are RO water rinse tanks. These tanks have overflows on the back of the tanks. Rinse water cascades from Tank 7 into Tank 6 (photo 1).

Tanks 8, 10, 12 and 14 are the anodizing tanks (photo 3), which contain 20% sulfuric acid where parts are dipped for 45 to 75 seconds. Tanks 9, 11, 13 and 15 are RO water rinse tanks for each of the anodizing tanks described above. These tanks have overflows on the back of the tanks. Tank 16 is a RO water rinse tank, which is the second rinse following rinses in Tanks 9, 11, 13 and 15. This tank also has an overflow on the back of the tank.

Aluminum parts are then placed in the black dye tanks or other color tanks depending on the customers specifications. Tanks 17 and 18 are black dye tanks where the parts are immersed for approximately 25 minutes (photo 3). Tanks 26-30 have different colors of dyes where the parts are immersed for approximately 25 minutes (photo 4). The dye colors include purple, red, orange, gray and blue. There is no Tank 25 or Tank 32 at the facility. Tank 31 has an old dye that is not used anymore. Tanks 19 and 20 are RO water rinse tanks after the parts are immersed in the color dyes (black, purple, red, orange, gray and blue). Rinse water cascades from Tank 20 into Tank 19. These tanks have overflows on the back of the tanks. Tank 19 had a 100-µm filter on the back overflow to filter out solids (photo 5). Tanks 21-23 are nickel seal tanks. The first two tanks (Tanks 21 and 22) are to seal the colored parts and the last tank (Tank 23) is for sealing the clear parts (no color) (photo 6). Tank 24 is the nickel seal rinse tank with deionized water. Tank 24 does not have an overflow. The chemical treatment and discharge of Tank 24 is described in Section 9, below. Wastewater overflow from the rinse tanks (Tanks 2, 4, 6, 7, 9, 11, 13, 15, 16, 19 and 20) flows down pipes on the back of the tanks (photo 2) to the polyethylene container on the floor of the anodizing area, which carries the wastewater to the Collection Tank (photo 9).

There are two sinks in the anodizing process room which are located on the opposite side of the nickel sealing tanks (photo 7). The sink next to the door is for blowing parts with air that come out of the seal rinse tank (Tank 24). Wastewater from this sink is collected in a bucket under the sink and placed in Tank 33 for nickel treatment (see Section 9). The other sink on the left is a general use sink and the wastewater drains to the floor and eventually to the Collection Tank (photo 9).

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. The facility has a RO system (photo 16) to purify the water that is used in the rinse tanks. The average daily flow volume discharged from the facility is approximately 2,550 gallons per day (gpd) comprised of approximately 50 gpd of domestic wastewater, 1,500 gpd of process wastewater and 1,000 gpd of RO reject 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?

Finishing Lab has one outfall permitted to discharge to the City's collection system; Outfall 001, which only includes process wastewater. Outfall 001 is located at the top of the 1,000-gallon Holding Tank (photo 13). The 1,000-gallon Holding Tank has mixers to circulate the water around in the tank and prevent settling (photo 15). The facility batch discharges the 1,000-gallon Holding Tank twice per day to the City sewer. A grab sample is collected from the 1,000-gallon Holding Tank twice per month. The City collects samples of Finishing Lab's effluent at the same location described above.

9. Describe the treatment system in place.

Wastewater from the nickel seal rinse tank (Tank 24) is treated with sodium hydroxide to precipitate and remove nickel as described below. Wastewater from the overflow of the rinse tanks (Tanks 2, 4, 6, 7, 9, 11, 13, 15, 16, 19 and 20) in the anodizing process is neutralized before it is discharged into the City's sanitary sewer system.

When the nickel seal rinse tank (Tank 24) is dirty, it is pumped to Tank 33 (photo 7), where the wastewater is treated with sodium hydroxide to a pH of 10.8 to precipitate out the nickel. The wastewater is then pumped through a five micron filter press (photo 8). The effluent from the filter press is sent to the Collection Tank (photo 9). The filter cake is placed in a container (photo 10) and disposed of off-site once a year by Mountain States Environmental Services.

Wastewaters from the rinse tanks (Tanks 2, 4, 6, 7, 9, 11, 13, 15, 16, 19 and 20) overflows on the back of the respective tanks to the polyethylene container on the floor of the process room (photos 1 and 3) to the Collection Tank. Filter press decant also flows to the Collection Tank. There is a sump pump in the Collection Tank that transfers the wastewater to the 200-gallon Tank (photo 11). The wastewater is then sent to the 1,000-gallon Holding tank (photo 12). The 1,000-gallon Holding Tank has mixers to circulate the water around in the tank and prevent settling (photo 15). The pH of the wastewater is measured in the 1,000-gallon Holding Tank prior to discharge. Sodium hydroxide is then added to the 1,000-gallon Holding Tank until the pH reaches a number between 5 and 12.5 with a target pH of 7 to 8. The pH of the wastewater is measured and documented and the 1,000-gallon Holding Tank is then discharged to the City. The facility is collecting grab samples of the discharge twice per month.

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

Acids were stored in locked cabinets (photo 14) outside the anodizing process room. The cleaner and sodium hydroxide etch containers are stored in secondary containment by the entrance to the facility outside the anodizing process room. The sealer and deoxidizer containers are also in a secondary bin by the entrance to the facility outside the anodizing process room. There were no floor drains at the facility. A five gallon black dye container was stored without secondary containment in the anodizing process area. See Finding 2 for additional information.

11. Are any hazardous wastes stored or discharged?

The filter cake containing nickel precipitate is collected in a container (photo 10) and disposed off-site once a year by Mountain States Environmental Services. Approximately 25-30 pounds per year of filter cake is collected and disposed off-site.

FINDINGS AND CORRECTIVE ACTIONS

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

Finding 1 – The facility did not have a slug discharge control plan and there was a potential for slug discharges to occur at the facility.

The facility has several chemical tanks (photos 1, 3 and 4) that could spill or leak into the polyethylene container on the floor of the anodizing process area that directs process wastewater to the Collection Tank (photo 9), which is eventually discharged to the City. There is also potential for spills to occur during the removal of spent chemicals and adding new chemicals to the tanks (photos 1, 3 and 4). For these reasons, Finishing Labs should have a slug discharge control plan.

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), “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

Develop a slug discharge control plan for the facility that includes all the elements described above in 40 C.F.R. §403.8(f)(2)(vi). Provide the City with a copy of the slug discharge control plan.

Finding 2 – A five gallon black dye container was stored without secondary containment in the anodizing process area.

A five gallon black dye container was stored in the anodizing processing area without secondary containment (photo 1). There is potential for a slug to occur if there is a leak in the container or a spill during the addition of black dye to the tanks. The spill or leak would go through the floor grate to the polyethylene container on the floor of the process room and then to the Collection Tank, which would send the wastewater to the 200-

gallon Holding Tank and then to the 1,000-gallon Holding Tank. The 1,000-gallon Holding Tank discharges to the City approximately twice per day. A concentrated spill, leak or slug of black dye might overwhelm the facility's pretreatment system and cause a slug discharge to the City.

Pretreatment Requirements

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), "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

Remove the five gallon black dye container from the anodizing process room or add secondary containment to the container. Provide photos of the corrective actions to the City. Provide the City with a description of how this corrective action was accomplished.

Finding 3 – Tank 31 has an old dye that is not used anymore at the facility.

Tank 31 has an old dye that is not used anymore at the facility. It is recommended that the contents of Tank 31 be disposed in accordance with federal, state and local regulations.

Recommendation

It is recommended that the contents of Tank 31 be disposed of in accordance with applicable federal, state and local regulations. Provide the City with a description of how this recommendation was accomplished.