

NPDES Inspection Report – Pretreatment Categorical Industrial User

National Database Information	
Inspection Date: 02/26/2025	Inspection Type: Pretreatment Categorical Industrial User
Entry/Exit Time: 9:00 am / 12:10 pm	NPDES ID Number: COPF00101
Inspection ID: 202502_COPF00101	
Lead inspector and affiliation: Stephanie Passarelli, EPA Region 8	
Inspector and affiliation: Stephanie Meyers, EPA Region 8	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: Jabil, Incorporated 1051 Synthes Ave. Monument, Colorado 80132	Mail Report (Electronic Delivery) to: Bukola Saliu, Senior EHS Specialist BUKOLA_SALIU@jabil.com

Contact Information	
	Name(s)/Title
Person/Company meeting definition of Owner/Operator	Jabil, Incorporated
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Bukola Saliu / Senior EHS Specialist / Jabil, Incorporated (present during opening, closing conference and facility walk-through)
	Felipe Magallanes / Facilities Engineer / Jabil, Incorporated (present during opening, closing conference and facility walk-through)
	Jeremy Hochmuth / Facilities Engineer / Jabil, Incorporated (present during opening, closing conference. Lead for facility walk-through)
	Adrian Baca / Facilities Manager / Jabil Incorporated (present during opening, closing conference and facility walk-through)
	Matt Blanchard / Senior Operations Manager / Jabil, Incorporated (present during opening and closing conference)
	Rex Goodstein and Morgan Strauss / Finishing Department / Jabil, Incorporated (present for facility walk-through)
POTW:	William Burks / Executive Director/Manager / Tri-Lakes Wastewater Treatment Facility (present during conferences and walk-through)
	Brian Skrdlant / Senior Operator / Tri-Lakes Wastewater Treatment Facility (present during conferences and walk-through)
Authorized Official(s)	Sandra Vincent / Regional EHS Manager / Jabil, Incorporated (not present)

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

Report Review and Signature		
Drafter Name	Date	Address/Phone Number
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Emilio Llamozas, NPDES and Wetlands Enforcement Section Supervisor		

Inspection Narrative and Site Description

Introduction

On Wednesday, February 26, 2025, at approximately 9:00 am, the U.S. Environmental Protection Agency (EPA) inspectors Stephanie Passarelli and Stephanie Meyers (inspectors) conducted a pretreatment categorical industrial user (CIU) inspection of Jabil, Incorporated (Jabil; facility) located at 1051 Synthes Avenue, Monument, Colorado. The purpose of the inspection was to evaluate Jabil's compliance with the requirements in 40 C.F.R. Parts 403 and 433 for the General Pretreatment Regulations and Metal Finishing Point Source Category, respectively. The inspection consisted of an opening conference, review of industrial processes, review of facility compliance, file review, facility inspection and a closing conference. Throughout the inspection, the inspectors recorded their observations in bound and electronic checklists.

The inspectors held an opening conference with the facility and POTW representatives listed above to explain the purpose of the inspection and discussed the role of the EPA regarding pretreatment regulations in Colorado. The control mechanism currently in effect includes the Notification of Discharge Requirements (COPF00101) and Fact Sheet issued to Jabil on May 26, 2020.

Facility representatives provided an overview of the operations and processes at Jabil. Inspectors proceeded to ask a series of questions to help evaluate compliance with pretreatment regulations found in 40 C.F.R. Part 433 for the Metal Finishing Point Source Category. Dischargers subject to these regulations include facilities that perform any of the following six metal finishing operations: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. Per the regulations, if any of those six operations are present, then the discharges from those operations and 40 ancillary process operations are subject to the metal finishing point source category. Based on discussions with facility representatives and information in the Fact Sheet, Jabil performs Anodizing and Coating processes (electropolishing and passivation); therefore, the facility operations are subject to the Metal Finishing Point Source Category regulations. The new source date for metal finishing indirect dischargers was August 31, 1982. Because the facility began metal finishing operations in 1992, the facility is classified as a new source.

Facility Description and Process Overview

Jabil manufactures titanium and stainless-steel screws and nails used in orthopedic implants for trauma surgery. The facility produced an average of 8.2 million screws and 314,000 nails over the past two years. The facility has been in operation at this location since 1979, with metal finishing processes commencing in 1992. The facility was owned by Johnson & Johnson dba DePuy Synthes LLC (2013 to 2019), and is currently under ownership of Jabil, Incorporated since 2019. Jabil discharges to the Monument Sanitation District and Tri-Lakes' publicly owned treatment works (POTW) which in turn discharges to Monument Creek.

Jabil operates 24-hours per day, Monday through Friday, with weekend overtime on Saturday and Sunday. Jabil is currently supported by approximately 600 employees spread out over three 8-hour shifts 6 am to 2 pm, 2 pm to 10 pm and 10 pm to 6 am each day. Finishing is conducted during all three shifts, six days a week. The facility does pause production operations for approximately two weeks in December and during other holidays.

The manufacturing process includes the following departments: Blank (heading) department; Screw 1 and Screw 2 departments; and Nail department, Finishing, and Packaging.

Raw materials used throughout the process are stored in the warehouse located at 1101 Synthes Ave. As needed, raw materials are transported by staff to the facility's production building (1051 Synthes Ave.).

The Blank (heading) department uses coil stock and titanium or stainless-steel bar stock to make screws. Coil stock is cut to length before deburring. Bead blasting and vibratory finishers are used in the machining processes and spent baths and rinse wastewater are sent to System 1 of the wastewater treatment system. Products are routed through an ultrasonic cleaner, containing deionized (DI) water and surfactant, to remove residual coolant.

Screw 1 and Screw 2 departments perform identical processes; the differentiating factor being that screws manufactured in the Screw 1 department originate from the Blank department, while screws manufactured in the Screw 2 department are made from bar stock. The machining operations involve turning the metal to create screws. The products are cleaned between steps using a DI water and surfactant in an ultrasonic cleaning tank (photo #1). The cleaning process uses Mirachem 500 cleaner and a rinse tank. The contents of the ultrasonic rinse tank are discharged every shift by manually releasing the tank contents to a sump that pumps to System 1 of the wastewater treatment system. Vibratory finishers are used to smooth out edges and spent detergent is discharged to System 1 of the wastewater treatment system (photo #3). The screw products are degreased in totally enclosed vapor degreasers (photo #2). The vapor degreasers use Novec (1,2-Trans-Dichloroethylene). Spent degreaser is disposed of off-site by Safety-Kleen and not discharged to System 1 of the wastewater treatment system.

The Nail department uses bar stock to produce rods. Machining operations produce different diameter nails and hollow them out. The machined nail products are cleaned using ultrasonic cleaning and vibratory finishers. All spent baths and rinse wastewater are sent to System 1 of the wastewater treatment system.

The machined and cleaned screws and nails are sent to the Finishing Department for metal finishing. The Finishing Department includes Electropolishing (EP), Passivation, and Anodizing. The process lines are segregated into areas within the Finishing Department. The process lines are mounted on above-grade grates located above two collection pits. One larger collection pit encompasses the EP and Passivation lines; a smaller collection pit is located below the Anodizing line. The wastewater generated from the metal finishing process lines in the Finishing Department are pumped from the two collection pits to System 2 of the wastewater treatment system.

Electropolishing

EP and Passivation are used to finish stainless steel products. Parts are routed through either the A or B route with identical baths in the process. The rinse baths have 200-gallon capacity, and chemical solution tanks are 350-gallon capacity.

Parts are placed in an alkaline clean bath (6% sodium bicarbonate), then rinsed in hot-water and cold-water cascading rinse baths. The flowrate for the continuous rinse tanks was recently modified to 6

gallons per hour, in comparison to 28 gallons per hour used in the past. This correction was incorporated due to past misinterpretation of units by Jabil.

The parts are placed in De-Ox descaling acid and heated electropolish tanks (phosphoric acid and sulfuric acid) charged with low electrical current (photo #7). The parts are rinsed in a hot water cascading bath and then two DI cold water cascading rinse baths.

Chemical solution tanks are reused and replenished with additional chemicals. The preventative maintenance (PM) schedule is followed for removal and disposal of chemical solutions. When the De-Ox and electropolish acid tanks become contaminated or spent, the solutions are barreled and sent offsite for disposal through Safety Kleen. The tanks are cleaned with a bleach and water solution according to the PM schedule. A shut-off valve was also added as a process improvement to prevent continual flow when cleaning the EP tanks. The alkaline clean bath and wastewaters generated from the EP process line including overflow, rinse tanks, and cleaning tanks, are collected in the pit located underneath the EP and Passivation process lines (photo #8) and then pumped to System 2 for treatment and discharge.

Passivation

The Passivation process line finishes stainless-steel parts and parts that initially go through EP are wet-transferred to the Passivation line. Parts are placed into a 50% nitric acid bath and then a 20% nitric acid bath (photo #6). Parts are then moved through a series of three cascading rinse tanks; two tanks of DI water and an ultrasonic rinse bath. The nitric acid baths are replenished with acid until the baths are contaminated or spent. The spent acid is disposed of offsite. The PM schedule indicated this process occurs semi-annually. The tanks are cleaned with a bleach and water solution according to the PM schedule. All tanks in the Passivation process line discharge to the pit (photo #8) located underneath the EP and Passivation process lines for discharge to System 2.

Anodizing

The Anodizing line finishes titanium products. A dilute detergent (Sparkleen) is used to clean the products followed by two cascading rinse baths of DI water which all discharge to wastewater treatment (photo #4). The products are then placed in the bonderite nitric acid bath for etching. The 135-gallon bonderite nitric acid bath is barreled and sent out for disposal as hazardous waste through Safety Kleen when the chemical is spent. Products are rinsed in two cascading DI water rinse baths and then placed in anodize neutral salt baths, followed by two DI rinse baths (photos #5). The DI rinse baths and anodize neutral salt bath discharge to the smaller of two collection pits. The wastewater contained in the smaller collection pit is pumped to the larger collection pit and eventually pumped to System 2 of the wastewater treatment. The tanks are cleaned by completely draining the tanks and cleaning them with a bleach and water solution.

Sterilization

Certain parts undergo initial sterilization at the facility. The parts packaged under sterile conditions are first rinsed in one of five thermal rinse washers with DI water at 180°F for sterilization and are air-dried prior to packaging. The wastewater from the thermal rinse washers is collected in a conditioning tank where City water is injected to allow the temperature of the wastewater to decrease as it is discharged to System 1 of the wastewater treatment system. Each of the five washers generates approximately 8 gallons of wastewater per cycle and each cycle lasts approximately one hour for 12 hours per day. Facility representatives confirmed in a follow-up email (03/07/25) the approximate volume based on Jan/Feb 2025, is 735 gallons per day (gpd).

Wastewater Treatment

The wastewater treatment system has two treatment systems (System 1 and System 2) that are designed to treat wastewater from the various manufacturing processes.

System 1 receives wastewater from stationary and mobile ultrasonic cleaners, vibratory deburring units, heated blank cleaning, the oil/water separator, and the metal finishing ventilation/air scrubber. Janitorial mop water is discharged through the oil/water separator before flowing into System 1. Additionally, the reverse osmosis/ deionization (RO/DI) purification system and thermal rinse for sterilization discharge to System 1. System 2 receives wastewater from the Metal Finishing Department (Electropolishing, Passivation, and Anodizing).

System 1

The wastewaters enter the System 1 holding pit, which can hold 14,180 gallons, but floats shut off incoming flow when the volume in the pit reaches 9,400 gallons. The wastewater in the System 1 pit is pumped to a series of three treatment chambers and a surge tank. Defoamer (ICM-TA-10X), coagulant (ACP-105), conditioner (benzo flocc 90-C), and caustic (50% caustic) for pH adjustment are added to the wastewater in chamber 1. The wastewater is mixed in chamber 2, and flocculant (ACP 720) is added in chamber 3 to bind the metals to the floc. Wastewater overflows from chamber 3 into a surge tank and is pumped into the clarifier. Sludge is removed from the bottom of the clarifier and sent to the System 1 filter press. There is also a backup filter press 2 that is not currently in use. Filter cake is disposed of in a class C landfill. Supernatant from the filter press and effluent from the clarifier flow to the Effluent 1 tank and then through a series of two 25-micron filter cannisters (filter bank 1&2) and sent to the Effluent 1&2 tank, where it combines with treated wastewater from System 2 (photo #11). The treated effluent then is sent through another 25-micron filter cannisters (filter bank 3) and then to the Final Discharge Tank. A second discharge tank was added to the process line in October 2021 and was intended to be used for sampling. However, in November 2023, Jabil provided notification this redundant tank, also referred to as “Sample Tank” adjacent to the combined “Effluent 1&2 tank”, was to be removed as samples were not collected at this location. Per the facility, effluent samples are taken from the tank labeled “Discharge Tank” (photos #13) prior to discharge to Monument Sanitation District sewer. A modified schematic of the wastewater treatment room is also attached.

System 2

Wastewater is collected into three 5,000-gallon and one 4,000-gallon storage tanks prior to treatment. The wastewater from the storage tanks is discharged to the System 2 pit. The System 2 pit can hold 784 gallons, but floats are installed to shut off incoming water at 500 gallons. The wastewater is pumped from the pit to a caustic chamber and then to a series of treatment chambers. In the caustic chamber, 50% caustic solution is added to raise the pH to 8. Defoamer (ICM-TA-10X), coagulant (ACP-72), and conditioner (benzo flocc 90-C) are added to the wastewater in chamber 1. Caustic (50% caustic) for pH adjustment is added in chamber 2. The wastewater is mixed, and flocculant (ACP 720) is added in chamber 3 to bind the metals to the floc. Wastewater overflows from chamber 3 to a surge tank and pumped to a clarifier. Sludge is removed from the clarifier and sent to the System 2 filter press. Filter cake is disposed of as hazardous waste every two weeks. Supernatant from the filter press and effluent from the clarifier flow to Effluent Tank 2 through a series of two 25-micron filter cannisters (filter bank 4 &5), and sent to Effluent 1&2 Tank, where it combines with treated wastewater from System 1 (photo #11). The combined wastewater flows from the Effluent 1 and 2 tank through an additional 25-micron filter cannister (filter bank 3) for polishing prior to being sent to the Final Discharge Tank. As noted in the System 1 description, a second discharge tank was added to the process line in October

2021 and was intended to be used for sampling. However, in November 2023, Jabil provided notification this redundant tank, also referred to as “Sample Tank” adjacent to the combined Effluent 1&2 tank, was to be removed as samples were not collected at this location. Per the facility, samples are collected at the “Discharge Tank (photo #13) prior to discharge to Monument Sanitation District sewer. A modified schematic of the wastewater treatment room is attached.

Facility Sample Collection

To meet requirements established in the facility’s control mechanism, Jabil collects quarterly wastewater samples from the final discharge tank (Outfall 001). A flow composite sample is collected for the required metal parameters, using an automatic sampler (Photo #12). The cyanide sample is collected as a grab sample from the Final Discharge Tank (Photo #13). Jabil uses sample bottles provided by the laboratory which contains the necessary preservatives. The flow and pH are continuously recorded from the discharge pipe of the final discharge tank. Additionally, Jabil has been under an Administrative Order on Compliance (AOC) since January 2023 due to effluent exceedances and is required to collect monthly wastewater samples of Zinc and Nickel in addition to the quarterly required monitoring. These additional samples are also collected at the final discharge tank, Outfall 001. The final set of monthly Zinc and Nickel samples required by the AOC were collected in January 2025. Jabil has since completed all monitoring and report milestones required as part of the AOC, and a letter for Closure of the Administrative Order on Consent was issued on March 6, 2025.

Facility Walk-Through

The inspectors performed a facility walk-through of the facility focusing on production lines, and operations using water and producing wastewater. The inspectors observed operations in the Blank (heading) department; Screw 1 and Screw 2 departments (Photos 1 - 3); and Nail department. The inspectors observed the Metal Finishing Department including the Electropolishing, Passivation, and Anodizing areas (Photos 4 - 8). The inspectors also observed the storage area for the machine oils, degreasers and other fluids, the wastewater treatment System 1 and System 2 (Photos 9 - 11), the final discharge tank and the monitoring point Outfall 001 (Photos 12 – 13).

Records Review

Prior to the scheduled inspection, Jabil provided requested records to the inspectors for review. Inspectors reviewed the Toxic Organic Management Plan (TOMP) and Slug Discharge Control Plan (SDCP). the Discharge Monitoring Reports (DMRs) and associated laboratory reports and chains-of-custody (COCs) from January 2023 (Q1 2023) to January 2025 (Q4 2024). Monthly submittals, to comply with an Administrative Order on Consent (AOC) requirement, were also reviewed for the period January 2024 to January 2025. In addition to the DMR and AOC submittals, the inspectors reviewed the pH min and max daily records for 2023 and 2024, the pH probe calibration records, discharge flow data for 2024 and 2025, and the waste hauling and waste breakdown sheets.

Based on records provided, inspectors evaluated flow volumes of non-regulated streams (oil/water filtration, air scrubber return, treatment system cleaning and sterile product packaging-thermal rinse) that are treated in System 1 of the wastewater treatment system to ensure that the combined wastestream formula (CWF) limits found in the Notification of Discharge requirements was still representative of the current discharges. Inspectors identified reduced flow volumes being sent to the treatment system. Jabil confirmed the process was changed in March 2024 to no longer send the DI reverse osmosis brine and other nonregulated waste streams through System 1. Additionally, documentation submitted following the inspection on March 7th, 2025 summarized a minor reduction

of regulated wastestream at the EP line due to process improvements, and a larger reduction of flow to System 1 due to RO/DI concentrate/backwash of filters now continuously discharged directly to the main drain (sanitary sewer) during DI water generation. Collectively, these modifications have resulted in a reduction of non-regulated flow from the estimated 5,279 gpd in the Notification of Discharge Requirements (NDR) Fact Sheet, to approximately 942 gpd currently. A summary of the nonregulated flows used as a basis for developing the NDR is shown below, in comparison to updated nonregulated flows confirmed following the inspection:

Non-regulated waste streams going to Treatment #1	2019 inspection basis for NDR (approx.)	2025 inspection
Oil/water filtration effluent	205 gpd	200 gpd (Jan-Feb 2025 avg)
Air scrubbers return water	190 gpd	0 gpd
DI RO water supply treatment brine	4,379 gpd	0 gpd
Cleaning/Maintenance wastewater of pretreatment system	55 gpd	7 gpd
Sterile product packaging thermal rinse	450 gpd	735 gpd (Jan-Feb 2025 avg)
Total non-regulated Wastewaters	5,279 gpd (approx.)	942 gpd

Closing and Follow-Up

Following the facility walk-through, the inspectors held a closing conference with Jabil representatives informing the facility contacts of the preliminary observations noted during the inspection and file review. On February 28, 2025, EPA emailed the preliminary findings to the facility representatives and requested additional information regarding the facility operations. Jabil provided a response on March 7, 2025, including requested information and response to preliminary findings. The findings and Jabil's response are noted below.

Findings, Corrective Actions and Recommendations

Finding #1: The PCR for 2024 Q1 (January – March) did not include all samples collected during the reporting period.

All monitoring events and analytical results conducted during Q1 2024 were reflected in the respective monthly AOC reports submitted in February, March and April 2024. However, not all the analytical reports, specifically the 02/20/24 monitoring event, were reflected in the Q1 2024 DMR submittal. The DMR for this quarter included analytical results uploaded for events conducted on 01/10/24; 03/06/24 and 03/13/24, but did not include the monitoring event conducted on February 20, 2024 which showed a Nickel effluent violation. Jabil did provide the required 24-hour notification and 5-day follow-up report to EPA once the exceedance was identified, and appropriately conducted a resample event.

Pretreatment Requirement:

COPF00101 – Notice of Discharge Requirements

Part III.B.6. Additional Monitoring (40 C.F.R. § 403.12(g)(6))

If the facility monitors any regulated pollutant listed in Part II.B.1 of this Notification of Discharge Requirements at Outfall 001 more frequently than required using the procedures required by Part II.C of this Notification of Discharge Requirements, the results of this monitoring shall be included in the Periodic Compliance Report (PCR).

COPF00101 – Notice of Discharge Requirements

Part IV.H. Definitions

3. Daily Maximum - Daily Maximum Limit: The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for the purposes of sampling. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all representative measurements taken that day.

7. Monthly Average - The highest allowable average of *daily maximum* over a calendar month, calculated as the sum of all *daily maximum values* measured during a calendar month divided by the number of *daily discharges* measured during that month.

Corrective Action #1:

Ensure that each PCR contains all monitoring events conducted at the monitoring point Outfall 001, and analytical results are uploaded regardless of whether the sample collected is an initial or resampling event. The facility should modify the DMR for the 2024 first quarter (January to March) to include a representative analytical result for all monitoring events conducted during this timeframe. The 2024 Q1 DMR submittal allows for submittal of one Daily Max and one Monthly average for each parameter. Therefore, if more than one sampling event occurs during the quarter, Jabil should evaluate all analytical reports conducted and determine the Daily Max and Monthly Average for each parameter across all sampling events and report this value on the DMR. Jabil should report the highest monthly average for the quarter, if sampling events are conducted in different months. Ensure Jabil's authorized signatory submits and approves these changes.

UPDATE 3/7/25: Following receipt of preliminary findings, Jabil provided a copy of the 02/20/24 laboratory analytical report. Please upload these results to the 2024 Q1 DMR to update the submittal. Additionally, update the DMR to accurately reflect the daily max experienced during the quarter for each parameter, this would document the Ni value from 02/20/24 of 2.18 mg/L, and appropriate monthly averages of the two monitoring events conducted in March. Modifications to NetDMR can be completed by Jabil's authorized signatory.

Finding #2: DMR submittals reviewed did not contain required components specified in Jabil's Control Mechanism.

For the timeframe October 2023 through January 2025, Jabil submitted compliance reports through NetDMR. Several of the submitted DMRs reviewed did not include PCR components identified in Jabil's Notice of Discharge Requirements (COFP00101), specifically the following:

- Monitoring Activity/Sampling records were not attached to DMR for 2024 Q2 (April – June)
- Monitoring Activity/Sampling records were not attached to DMR for 2024 Q3 (July and August).
- Flow, pH and Cyanide data were not accurately submitted for 2024 Q2 (April to June)
 - NODI-A, a general permit exemption, was used for pH and Cyanide. This is not an acceptable code; these are required parameters in the NDR.
 - NODI-B was used for flow indicating below detection limit/no detection. This is not an appropriate code for reporting flow.
- Flow and pH data were not submitted for 2024 Q3 (July to September).
 - NODI-B was used for flow indicating below detection limit/no detection. This is not an appropriate code for reporting flow.
- TTO certification (or analysis) was not included for 2024 (the last TTO certification received was in January 2024 for the prior six-month period (July to December 2023)).

Pretreatment Requirements:

COPF00101 – Notice of Discharge Requirements

Part III.B.1. Periodic Compliance Reports (40 C.F.R. § 403.12(e); 40 C.F.R. § 403.12(g)(6); 40 C.F.R. § 403.12(l))

The facility shall submit Periodic Compliance Reports to the EPA (see Part III.I for address) as follows:

1. Due Dates

Periodic Compliance Reports shall include a discharge monitoring report (DMR) containing the results from periodic discharge sampling conducted in accordance with the effluent limitations, monitoring requirements, and TTO certification statement in Part II.B of this Notification of Discharge Requirements. The TTO certification statement shall be submitted as an attachment when submitting the Periodic Compliance Report on NetDMR.

The DMR shall be fully completed using all applicable information during the compliance monitoring period. In the event no discharge occurs during the compliance monitoring period, this may be indicated with the No Data Indicator (NODI) Code of C - "NO DISCHARGE" on the DMR

2. Discharge Monitoring Report

Periodic Compliance Reports shall include a discharge monitoring report (DMR) containing

the results from periodic discharge sampling conducted in accordance with the effluent limitations, monitoring requirements, and TTO certification statement in Part II.B of this Notification of Discharge Requirements. The TTO certification statement shall be submitted as an attachment when submitting the Periodic Compliance Report on NetDMR. The DMR shall be fully completed using all applicable information during the compliance monitoring period. In the event no discharge occurs during the compliance monitoring period, this may be indicated with the No Data Indicator (NODI) Code of C - "NO DISCHARGE" on the DMR.

3. Monitoring Activity/Sampling Records (40 CFR § 403.12)

A copy of the laboratory analysis report and other supporting information shall be included for any reportable data submitted in the compliance report as an attachment either in the hard copy report or submitted to NetDMR. The laboratory analysis report and other supporting information shall include the information listed in Part II.D.

4. Flow Data

Submit a record on the DMR of the measured average and maximum daily flows from Outfall 001 for each month in the reporting period.

5. pH Data

Submit a record on the DMR of the measured minimum and maximum pH from Outfall 001 for each month in the reporting period.

6. Additional Monitoring

If the facility monitors any regulated pollutant listed in Part II.B.1 of this Notification of Discharge Requirements at Outfall 001 more frequently than required using the procedures required by Part II.C of this Notification of Discharge Requirements, the results of this monitoring shall be included in the Periodic Compliance Report.

7. Certification Statement

Include the certification statement required by 40 C.F.R. § 403.12(l) and referenced in Part III.J of this Notification of Discharge Requirements. The certification statement shall be signed by the appropriate signatory official as stated in Part III.J of this Notification of Discharge Requirements.

Corrective Action #2:

Ensure the correct code is updated in NetDMR for pH, flow, and Cyanide for 2024 Q2 (April to June) and 2024 Q3 (July to September). Upload TTO certifications and analytical reports for 2024 Q2, 2024 Q3 to NetDMR.

Ensure complete Periodic Compliance Reports are submitted in NetDMR (or submit a hard-copy with an original signed certification statement as noted in Jabil's Notice of Discharge Requirements Part III.I).

Update 03/07/2025: In response to preliminary findings, Jabil submitted outstanding analytical reports via email for missing quarters 2024 Q2 and Q3. Jabil also submitted via email two TTO certification analytical reports for 2024 addressing the missing parameter. With approved signatory in place, please upload these documents to NetDMR to ensure complete submittal of records.

Finding #3: The DMR for 2024 Q4 (October – December) was not submitted.

Due to recent staffing changes, Jabil was delayed in designating and getting approval for an authorized representative in NetDMR to access, sign and submit required reports. As a result, at the time of the inspection, Jabil had not submitted the 2024 Q4 PCR for the monitoring period October through December 2024. In response to preliminary findings, Jabil submitted to EPA confirmation the authorized signatory in NetDMR would be Ms. Sandra Vincent, Regional EHS for Jabil, Inc. Ms. Vincent was approved and granted access to Jabil's NetDMR account. Response to findings also included an emailed copy of a completed PCR for October through December 2024, however this report was not signed by the designated authorized representative, analytical results have not been uploaded, and the PCR has not been submitted in NetDMR.

Pretreatment Requirements:

COPF00101 – Notice of Discharge Requirements

Part III.B.1. Periodic Compliance Reports (40 C.F.R. § 403.12(e))

The facility shall submit Periodic Compliance Reports to the EPA (see Part III.I for address) as follows:

1. Due Dates

Periodic Compliance Reports are due by the dates listed below and shall not be submitted until the compliance monitoring period is complete. The report shall contain information from the associated compliance monitoring period.

Compliance Monitoring Period	Due Date
January through March	April 30
April through June	July 31
July through September	October 31
October through December	January 31

Corrective Action #3:

Ensure a complete PCR for the monitoring period 2024 Q4 (October through December) is submitted in NetDMR. Ensure required components of a complete PCR specified in the control mechanism and Finding #2 are included. Provide EPA with a response on how the facility will implement submission of PCRs and this corrective action going forward.

Finding #4: The Slug Discharge Control Plan for the facility included outdated schematics and facility contacts. The plan reviewed included contact information from prior employees for emergency notification procedures. In addition, the schematic of the wastewater discharge operations had not been updated reflecting removal of redundant tank at the Outfall.

Pretreatment Requirements:

COPF00101 – Notice of Discharge Requirements

Part II.E. Slug Discharge (40 C.F.R. § 403.8(f)(2)(vi))

The facility shall take steps to prevent slug discharges and ensure it maintains and implements current slug discharge control plan that adequately addresses current conditions.

The slug discharge control plan shall contain the following elements:

1. Description of discharge practices, including non-routine batch discharges;

2. Description of stored chemicals;
3. Procedures for immediately notifying the POTW of Slug Discharges, including any discharge that would violate a general or specific prohibition listed in Part II.F, with procedures for follow-up written notification within five days;
4. 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 #4:

Ensure the Slug Discharge Control Plan is updated to reflect current wastewater discharge operations, including updated schematic, and current personnel responsible for emergency notification or spill procedures. In your response to EPA, provide an updated control plan or a proposed timeline on when the slug discharge control plan will be updated.

Finding #5: The facility did not provide notification of changed processes to eliminate the RO/DI brine wastewater from being discharged through wastewater treatment System 1. Since

monitoring is conducted after the combination of wastewater treatment from System 1 and System 2, the alternative effluent limitations are based on the process flow wastewater in addition to non-regulated wastestreams. The reduction of non-regulated wastestreams, including the RO/DI brine impacts the combined wastestream formula and calculated alternative effluent limitations specified in Jabil's Notice of Discharge Requirements.

Pretreatment Requirements:

COPF00101 – Notice of Discharge Requirements

Part III.E. Notification of Changed Discharge (40 C.F.R. § 403.12(j))

The facility shall promptly notify the EPA and the POTW in advance of any substantial change in the volume or character of pollutants in its discharge, including any of the listed or characteristic hazardous wastes referenced in Part III.F of this Notification of Discharge Requirements. For purposes of establishing alternative limits based on the combined wastestream formula, the facility shall notify the EPA and the POTW if the regulated or non-regulated wastewater flow amounts listed in the Fact Sheet increase or decrease by 20%.

Corrective Action #5:

Ensure going forward, Jabil provides proper notification of any changed discharges in advance of any substantial change in volume or character of pollutants in its discharge.

Additionally, Jabil needs to coordinate with EPA to ensure appropriate and representative effluent limitations are in place. The facility should return the RO/DI wastestream to the System 1 to resume comparable flow and maintain the previously established effluent limitations calculated to account for both regulated and non-regulated wastestreams. Or, if the facility chooses to continue to discharge RO/DI wastestream prior to wastewater treatment, submit a request to EPA to reevaluate and modify the effluent limitations to no longer account for the approximately 5,000 gpd of nonregulated wastestream passing through the monitoring point. In your response to the EPA, provide which option the facility will pursue, and proposed timeline to complete these actions.