



Industrial User Facility Inspection Report U.S. EPA, Region 8

Name of industry and location:

Dystar Foam Control
311 Cleveland Place
Cheyenne, WY 82007

Control Authority / NPDES Permit No.

Cheyenne Board of Public Utilities (BOPU)
NPDES Permit No. WY-0022934

IU – NPDES ID

WYPIU0005

Date of visit:

March 12, 2025

Approximate Time of visit:

0800 - 0920

Name(s) / Affiliation / email of inspector(s):U.S. EPA:

Al Garcia, garcia.al@epa.gov

Cheyenne BOPU:

- Nathaniel Kaufhold nkaufhold@cheyennebopu.org
- Jake Ward jward@cheyennebopu.org
- Rob Achenbach rachenbach@cheyennebopu.org

General Facility Information:Representatives at Inspection:

- Chris Robinson – Plant Manager, robinson.christopher@dystar.com
- Matt Hollmann – Process Engineer, Hollmann.mattew@dystar.com

Type of Business Operations:

- Manufacture of defoaming products for applications in the food products industry.

Facility Information:

- 21 employees
- five days/week, (Monday through Friday).
 - Early Morning Shift (5 a.m. to 2 p.m. – 5 employees)
 - Day Shift (8 a.m. to 5 p.m. – 13 employees total which includes 6 admin)
 - Night Shift (5 p.m. to 5 a.m. – 3 employees)

Inspection Description:

Al Garcia from the U.S. Environmental Protection Agency (EPA) and Nathaniel Kaufhold, Jake Ward and Rob Achenbach from the Cheyenne BOPU conducted a significant industrial user (SIU) inspection of the Dystar Foam Control facility (facility) located at 311 Cleveland Place, Cheyenne WY 82007. The SIU inspection was conducted as part of the EPA Pretreatment Audit of the BOPU's Publicly Owned Treatment Works (POTW) and EPA-approved Pretreatment Program. The inspection of the facility provides current conditions of the facility's unit operations and consisted of an evaluation of the waste streams generated from the unit operations, management of these waste streams, including potential for spills and slug discharges. The facility maintains a

zero-discharge management status to the sewer collection system leading to the BOPU's Crow Creek POTW.

Upon arriving at the facility on March 12, 2025, at approximately 8:00 a.m., Al Garcia of the EPA presented credentials to the facility representatives and explained the purpose of the inspection. During the opening interview, the facility representatives provided an overview of the operations and processes at the facility, waste streams generated, and the management/discharge of these waste streams. The opening interview was followed by a facility tour to visually inspect the unit operations. The EPA conducted a closing conference to discuss potential findings and recommendations identified during the inspection.

Process Description:

The facility, located at 311 Cleveland Place, Cheyenne, WY 82007, manufactures defoamer products for the food processing sector. The facility has 21 employees and operates three operational shifts from Monday through Friday. The Google Maps view of the facility is shown in Figure 1.



Figure 1 – Dystar Foam Control - Google Maps View

Chemical and Raw Materials Storage –

The facility receives raw materials into its warehouse located on the west side of the building. The facility has a bulk storage tank farm located on the south side of the building and receives chemicals in totes, drums, carboys in the receiving/shipping docks on the south side of the facility. The EPA did not gather a complete list of raw materials during the inspection; the following list are general types of raw materials at the facility:

- Bulk Storage outside tank farm (ranging from 13,000 gallons to 25,000 gallons) – these raw materials are received in bulk tankers. The tanker delivers to the tank farm and connects flexible hosing to the raw materials receiving manifold with delivery pipes servicing each tank. The pipes and valves are labeled and are locked. According to Mr. Robinson, a facility operator is required to unlock the valve

and monitor the delivery to the correct tank. The facility constructed a large containment trench in the bulk tank receiving area to contain spills. The spills are pumped to the wastewater storage tank.

- Canola Oil – two 20,000-gallon tanks
 - Soybean Oil – one 25,000-gallon tank
 - Poly-ol raw materials such as propylene glycol – eight tanks
 - Light mineral oil – one 13,000-gallon tank
 - Wastewater Storage tank – one 15,000-gallon tank
- Warehouse inside storage – the facility has a large storage space in which raw materials are received and forklifted to storage, either on racks for drums, or bags, supersacks and carboys. The totes are stacked on each other for storage.
 - Oleic acid
 - Fatty acids
 - Silica dioxide
 - surfactants

The raw materials from the bulk storage tank farm are piped to the batch tanks delivery area located on an engineered level above the batch tanks. The warehoused materials such as sacks, drums, and totes are forklifted from the storage location and lifted to the delivery area by a hydraulic lift.

Based on observations during the facility tour, it does not appear that the facility has any floor drains in the warehouse storage/receiving/handling areas with the following exceptions:

- Tank #17 located in a retaining wall in the warehouse. The retaining wall was engineered to contain spills, leaks or the entire contents of the tank, in case of catastrophic failure. An open floor drain exists on the southeast side of the tank. According to Mr. Robinson and Mr. Hollmann, this tank is not used, however, the open floor drain conveys to the BOPU's sanitary system.
- The Cold Storage Room is in a satellite room east of the main warehouse area. It does not appear that the facility currently stores liquid raw material or product in this room. A large trench drain is constructed in this room to contain spills.

Defoamer Production –

The facility has five batch mixing/blending tanks in the production area to manufacture the defoamer products; these tanks range from 8,000 lbs to 55,000 lbs in capacity. According to information gathered during the inspection, the facility has about 100 recipes for its products but manufactures products based on 20 to 25 recipes in a typical production week. The facility produces about two to three batches of product per day.

The raw materials contained in drums, totes, supersack/bags and other storage containers are forklifted from the warehouse to the production area and lifted with an elevator supply lift to the blending/mixing platform. The raw materials from the tank farm are piped to the platform. The facility has a liquid ingredient meter that is programmed to ensure the correct measurements from the pipes carrying raw materials from the tank farm into the batch tank. The operator is responsible for following recipes and mixing in the correct raw material and weight of the material delivered from the warehouse. The raw materials are blended, mixed and allowed to react in the batch tank. Depending on the type of recipe, the blended product in the tank may undergo the following additional reaction operations:

- Batch tank heated for ester products.
- Contents of batch tank looped to a milling machine to mill using high shear, low tolerance blades and forcing through a mesh filter.

- Contents of batch tank looped to a homogenization machine which uses pressure differential to break up silica or oils and force through filters.

After a batch tank is completed for the production day, the facility cleans the batch tanks and associated hoses or reaction equipment using manual cleaning techniques such as scraping solids, using a water supply spray wand, hot water and steam. According to facility representatives, the cleaning procedure takes approximately 30 minutes, and they were not aware of the wastewater volume generated. The cleaning wastewater is collected in an approximately 40-foot x 1-foot trench drain running the length of the batch tank production room. The trench drain leads to a pump that is manually transferred to the 15,000-gallon wastewater collection tank in the outside tank farm.

The produced defoamer products are sent to a filter bay and may be filtered in 25μ, 400μ or 800μ filters, depending on the product. The filters are disposed in the municipal trash when spent, according to facility representatives. The products are then packaged or may be sent to the three intermediate product tanks located in the warehousing area (two 2,250-gallon tanks and one 7,000-gallon tank) or the finished product tanks located in the loading dock area (two 7,000-gallon tanks, one 4,500-gallon tank and one 25,000-gallon tank). The finished product tanks are used to store product and for off-loading into bulk tanks in the loading dock area. Based on the EPA's observation, it appears that the facility has adequate spill containment in the warehouse and the loading docks to contain spills from these tanks.

Wastewater Management –

The facility maintains a zero-discharge status for its regulated wastewater by collecting batch tank production wastewater in the trench drain constructed in this area and pumping to the 15,000-gallon wastewater storage tank located in the outside tank farm. The contents of the wastewater storage tank are serviced and hauled off-site about two to three times per week to McDonalds Farms.

EPA Classification of the Industrial User

Based on observations and information received during the inspection, the facility is categorized as a facility subject to the Standards and conditions found in Title 12-Public Service, Chapter 13.20-Wastewater Treatment and Disposal of the BOPU Pretreatment Ordinance.

Summary of Findings

Dystar Foam Control
NPDES ID# WYPIU0005
March 12, 2025

Pretreatment Inspection Findings	Follow up Action Items
1. The Pretreatment Regulations at 40 C.F.R. § 403.8(f)(2)(vi) require the facility to control slug discharges defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions.	<u>Pretreatment Requirements</u> 40 C.F.R. § 403.8(f)(2)(vi) 40 CFR 403.8(f)(2)(vi)(D) <u>Corrective Action Item</u> Develop a slug discharge control plan to procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and

Based on observations from the facility inspection, an open floor drain leading to the BOPU's sanitary sewer exists within the retaining wall of tank #17. Although the tank is not used according to facility representatives, the open floor drain represents a potential slug discharge to the BOPU in case of inadequate training or operator error when managing spills occurring in the warehouse. This may result in a violation of the facility's zero-discharge permit.	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. <u>Recommendation</u> In lieu of developing a slug discharge control plan, the EPA recommends the facility permanently plug the open floor drain to eliminate the slug discharge potential.
2. The Pretreatment Regulations at 40 C.F.R. § 403.8(f)(2)(vi) require the facility to control slug discharges defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. If a slug discharge potential is identified, the facility is required by the Pretreatment Regulations to develop a plan to control slug discharges, including the following in 40 CFR 403.8(f)(2)(vi)(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.” During the inspection, the EPA observed a constructed trench drain in the Cold Storage Room. The trench drain is not equipped with a pump to convey spills or leaks to the wastewater storage tank and is only used for containment of potential spills. The facility stated during the inspection that the room is not used for liquid storage.	<u>Pretreatment Requirements</u> 40 C.F.R. § 403.8(f)(2)(vi) <u>Corrective Action Item</u> Evaluate potential storage or handling/transfer of liquid raw materials or products in the Cold Storage Room and determine if spill/slug discharge controls are necessary.

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
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Reviewer Name	Address/Phone Number	Date
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Supervisor Signature/Name	Address/Phone Number	Date
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