

REPORT OF THE PRETREATMENT COMPLIANCE INSPECTION

AT

City of Great Bend

P.O. Box 1168

Great Bend, Kansas 67530

NPDES Permit No.: **KS0038491**

BY

REGION 7

ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH / DRINKING WATER AND INSPECTIONS SECTION (WB/DWIS)

ON

MARCH 26 AND 27, 2024

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Pretreatment Compliance Inspection of the Great Bend Approved Industrial Pretreatment Program was conducted on March 26 and 27, 2024. To direct the inspection, a checklist was used that evaluates all important elements of the Pretreatment Program. A copy of the checklist is attached to this report (Attachment 1). The inspection consisted of a discussion and file review with the city's program staff. In addition, I conducted a file review of the city's Biosolids Management Program (Sludge). Steve Caspers with the Bureau of Water-Industrial Program Section of the Kansas Department of Health and Environment was present during the pretreatment evaluation portion of the inspection. This narrative report presents the findings of the inspection.

Participants

City of Great Bend

- April Batt, Laboratory Technician/Environmental

abatt@greatbendks.net

Bureau of Water-Industrial Program Section-KDHE

- Steve Caspers, Pretreatment Specialist

Steve.Caspers@ks.gov

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

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS

Ahmad.naji@epa.gov

Facility Description and Program Overview

The City of Great Bend, with an approximate population of 14,489 (2022 census estimate), owns and operates an activated sludge Wastewater Treatment Plant (WWTP) under the Kansas National Pollutant Discharge Elimination System Permit (NPDES) number KS0038491 that is set to expire on December 31, 2026.

The activated sludge plant utilizes a mechanical bar screen, a grit removal system, two extended aeration basins, a post-aeration system, two secondary clarifiers, a two-stage anaerobic digester, sludge drying beds, and an ultraviolet disinfection treatment. Produced sludge is land applied. According to the NPDES permit, the WWTP has an average dry weather (ADW) flow of 3.6 million gallons per day (mgd). According to city personnel, the plant has the capacity to treat a maximum wet weather flow of 7.21 mgd, and the 2023 actual average daily flow was approximately 1.2 MGD. The WWTP generated 229 dry tons of sludge in 2023 with three percent solids (3%). The WWTP treated effluent is discharged to the Arkansas River via outfall OU01.

While the Great Bend Industrial Pretreatment Program (IPP) currently regulates three Significant Industrial Users (SIUs), the WWTP only receives hauled waste from one SIU that makes less than one percent (<1%) of its actual (average dry weather) influent of 1.2 mgd.

According to the IPP Coordinator, the city is in the process of revising its Sewer Use Ordinance (SUO) and its Enforcement Response Plan (ERP). Steve Caspers indicated that he is assisting the city finalizing and submitting the draft documents to KDHE and the EPA for approval. The Great Bend IPP was originally approved on January 8, 2006.

Legal Authority

The city's original Sewer Use Ordinance (SUO) number 4121 - Chapter 13.06 under Title 13, was approved on January 8, 2006. The chapter gives the city the authority to implement and enforce the Pretreatment Program, such as issuing permits for a duration of five (5) years or less and the right to inspect, sample, enforce, and collect fines up to one thousand dollars (\$1,000) per violation per day.

The city incorporated (according to previous inspection reports) the required provisions of the EPA 2005 Amendments to the General Pretreatment Regulations [40 CFR 403.8, 40 CFR 403.13] known as the Streamlining rule, but has chosen not to incorporate any of the optional streamlining provisions. However, according to KDHE and the IPP Coordinator, this ordinance did not incorporate all the required Streamlining rule provisions. Therefore, the city drafted a new SUO, and it is currently being reviewed by the city attorney (Attachment 2). The provided draft SUO document highlights the proposed changes.

Steve Caspers mentioned during the inspection that he will assist the city in finalizing the draft so the city can formally submit it to the EPA and KDHE in the near future.

Upon my return to the office, I noticed that Section 13.06.1220(a) - Civil Penalties of the SUO reads, "A user who has violated, or continues to violate, any provision of this chapter, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall be liable to the city for a maximum civil penalty of \$1,000.00 per violation, per day." This language does not approve with the requirement of 40 CFR 403.8(f)(1)(vi)(A) that reads, "All POTWs shall have authority to seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements".

Local Limits

The last local limits evaluation was conducted in 2014 as an initiative by KDHE and the EPA to evaluate local limits for all approved IPPs in the State of Kansas. On December 10, 2015, the EPA and KDHE approved the city's local limits. The 2015 local limit calculations showed that biochemical oxygen demand (BOD) was at forty-one percent (41%), the total suspended solids (TSS) was at forty-nine percent (49%), and the total kjeldahl nitrogen (TKN) was at sixty-four percent (64%) of the WWTP capacity.

Table 1 below lists the numerical mass values of the Maximum Allowable Headworks Loadings (MAHL) from all sources, including domestic, and the Maximum Allowable Industrial Loading (MAIL). It was noted by the EPA and KDHE that while Table 1 indicates that mercury is not allowed, the city needs to recalculate their mercury limit using the Kansas revised water quality standard. Mercury has accumulated in the POTW's sludge, and the source of it is unknown. It was suggested that the source could be the local dentists, or it could be introduced via hauled waste.

Table 1, 2015 Local Limits for the Great Bend WWTF (Mass Lbs./day)

Pollutant	MAHL (lbs./day)	MAIL (lbs./day)	Pollutant	MAHL (lbs./day)	MAIL (lbs./day)
Arsenic (T)*	0.116	0.082	Mercury (T)	NONE ALLOWED	
Cadmium (T)	0.153	0.130	Molybdenum (T)	0.181	0.118
Cyanide	0.047	0.026	Nickel (T)	0.774	0.681
Chromium (T)	3.376	3.045	Selenium (T)	0.242	0.173
Copper (T)	1.513	0.561	Silver (T)	0.564	20.456
Lead (T)	0.423	0.188	Zinc (T)	4.25	2.601

*Total

40 CFR 122.44(j)(2)(ii) requires the city to provide a written technical evaluation of the need to revise local limits under [40 CFR 403.5\(c\)\(1\)](#), following permit issuance or reissuance. The current NPDES permit was issued on January 1, 2022, and will expire on December 31, 2026. According to KDHE, local limits were technically evaluated in 2023 but since there were no changes to the WWTP, no new industries added, and no other changes (water quality standards did not change), it was decided the existing local limits did not need to be changed.

Industrial Waste Survey and Significant Industrial Users

The most recent industrial waste survey (IWS) was conducted in 2013, during the evaluation of local limits that were approved in 2015. The survey did not result in any new industries in addition to those already regulated by the city. The Great Bend's industrial community has remained constant with three industries. The list of industries is maintained and updated almost annually because of the interdepartmental communications within the city and because the IPP Coordinator occasionally sends out a survey to new businesses that could potentially be under a federal standard. Currently the city regulates three industries by issuing permits. All three are

subject to the Metal Finishing Pretreatment Standard 40 CFR, Part 433. Two are non-dischargers and one hauls its waste to the WWTP because it's not connected to the city's collection system.

Doonan Specialized Trailer LLC (Doonan) manufactures custom hopper bottom grain trailers, firefighting equipment, platform trailers, oil field floats, pressurized vessels water tanks, and combination aluminum/steel drop deck trailers. Doonan is subject to the Metal Finishing standard 40 CFR, Part 433 for the cleaning process (etching). Doonan is located approximately two miles outside the city limits, and it is not connected to the city's collection system, but it hauls its regulated waste to the City's WWTP.

Hampton Hydraulics dba Great Bend Industries (GBI) manufactures custom hydraulic cylinders. GBI is subject to the Metal Finishing standard 40 CFR, Part 433 for its conversion coating process, as steel parts are phosphated. GBI is a No-Discharge facility and recycles all process waste. Waste is shipped off site.

Fuller Brush Company (Fuller Brush) is subject to the Metal Finishing standard 40 CFR, Part 433 for the conversion coating of the metal mop handles (a two-stage phosphating operation), and subject to 40 CFR, Part 455-Subpart C, Pesticide Chemicals Formulating and Packaging Subcategory for the aerosol can-filling operation. Fuller Brush is a batch discharge facility, for the discharge of regulated waste from the coating operation and a continuous discharge from surfactants manufacturing. Fuller Brush continue to select the zero-discharge option of the 40 CFR 455 rule and does not discharge any regulated wastes from the Pesticides regulated activities to the sanitary sewer system.

Dental Amalgam Rule

Records indicate that on October 30, 2018, the city contacted all eleven dental offices in the city, based on the list of Kansas Dental Association and the list of Kansas Dental Board provided by KDHE. All, but three, responded back. All eight indicated that they have a separator in place. The city did follow up and determined that there are seven dental offices as list in Table 2.

Table 2, Great Bend dental offices

Name	Report Submitted	Separator Installed	Meets ISO	Date Received
Dunekack	Yes	Yes	Yes	12/11/2018
Huslig	Yes	Yes	Yes	1/16/2019
Ohnmacht	Yes	Yes	Yes	4/2/2019
Hart	Yes	Yes	Yes	1/25/2019
Leiker	Yes	N/A Specialty Orthodontics	N/A	11/9/2018
Kutina	Yes	Yes	Yes	12/20/2018
Rosenburg	Yes	Yes	Yes	1/24/2019

Permits

All industries have current permits, and the city issues the permits with a five-year duration and a \$350.00 annual fee. Overall, permits appeared to contain the necessary elements required by 40 CFR 403.8(f)(1)(iii)(B) for an enforceable permit and include the categorical limits since they are more stringent than the local limits. Permit renewal applications are due 60 days prior to permit expiration date. Records indicate that industries submitted complete and adequate permit renewal applications.

Permits allow all CIUs subject to the Metal Finishing Categorical standard 40 CFR Part 433 the option to sample for Total Toxic Organics (TTO) or the development, submittal, and implementation of a Solvent Management Plan (SMP) or Toxic Organic Management Plan (TOMP) in lieu of sampling for TTOs.

The city is currently working with Hampton Hydraulic to modify their permit to include AEI Tube Washer as an additional outfall.

Inspections, Compliance Monitoring, Self-Monitoring, and Reporting

The IPP Coordinator conducted inspections of all regulated industries in the past 12 months. Inspection reports appeared adequate and comprehensive. April Batt evaluated the need for industries to develop slug control plans during the inspection and included the determination in the inspection report.

Sampling and self-monitoring reporting is described in detail in the industrial permits. The city performs compliance monitoring of its industries at least once per year. During the inspection it was noted that the city did not sample Doonan's hauled waste for pH in 2002 and 2023, as required. Therefore, I issued a Notice of Preliminary Finding because the city did not present records that the IPP collected pH sample during the annual compliance monitoring event of Doonan Specialized Trailer in 2022 and 2023 as required by 403.8(f)(2)(v).

As mentioned above, all industries are subject to the Metal Finishing Categorical Standard 40 CFR Subpart 433. However, two of which are non-dischargers. All industries, in lieu of monitoring for TTO, submitted TTO Certification statements that certify the development and implementation of SMP. Records indicated that Doonan submitted a plan on April 19, 2016, Fuller plan was signed on July 15, 2019, and GBI's plan was developed in February 2012.

Fuller signed non-discharging statement for all 2023, therefore no sampling was collected. Hampton is a non-discharging facility. Samples were only collected from Doonan when they bring their hauled waste.

My review of industrial files indicated that monitoring reports were reviewed by April Batt to determine compliance.

Enforcement

The Enforcement Response Plan (ERP) was originally developed and approved on January 8, 2006. As part of the SUO revision, the city is also revising the ERP (Attachment 3).

April Batt appeared to have a good knowledge of EPA's Significant Non-Compliance (SNC) definition, and the program appeared to take enforcement within 30 days of when a violation is noted. Records indicated that the last violation was in 2021, and the IPP Coordinator issued one violation to Fuller for submitting a late monitoring report.

During the inspection we discussed the systematic procedures of initiating enforcement when an exceedance occurs. Since April Batt is the laboratory Technician and the IPP Coordinator, becoming aware of a violation and initiating enforcement can be done in a timely manner as required by the ERP.

Waste Haulers

The city continues to accept domestic waste at the headworks and special waste from Doonan. On average, the city accepts 20 loads per month (3,000 gallons) from two permitted haulers. Doonan hauls 1,000 to 2,000 gallons per month. Haulers are required to obtain an annual permit from the city before they are allowed to dump at the plant. Hauled waste is only accepted by the WWTP during regular work hours. The city also requires each hauler to complete a form indicating the source, type, and date of the waste prior to accepting the waste. The city continues to randomly sample loads.

Sludge Quality

One function of the IPP is to protect the city's sludge from metals contamination. As part of this inspection, the 2022 and 2023 annual biosolids reports were reviewed to determine the IPP's effectiveness. In 2023, the city produced 229 dry metric tons (dmt) as Class B sludge and land applied 185 dmt. In 2022, the city produced 259 dmt and land applied 188 dmt. The city's original Sludge Management Plan was developed in 1994.

Below are the 2022 and 2023 tables that compares the city's peak observed metals level against the statutory ceiling and the city's average level against the exceptional quality (EQ) sludge level specified by the 40 C.F.R. Part 503 Sludge regulations. Because the city sampled its sludge quarterly in 2022 and 2023, the monthly average is the maximum value observed.

Table 3, 2022 Great Bend WWTP Sludge Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	4.9	4.9	6.53%	11.95%
Chromium	3000	1200	31.9	31.9	1.06%	2.66%
Cadmium, Cd	85	39	2.1	2.1	2.47%	5.38%
Copper, Cu	4300	1500	709.2	709.2	16.49%	47.28%
Lead, Pb	840	300	93.5	93.5	11.13%	31.17%
Mercury, Hg	57	17	0.69	0.69	1.21%	4.06%
Molybdenum , Mo	75	----	21	21	28.00%	
Nickel, Ni	420	420	20	20	4.76%	4.76%
Selenium, Se	100	36	36.9	36.9	36.90%	102.50%
Zinc, Zn	7500	2800	1257	1257	16.76%	44.89%

Table 4, 2023 Great Bend WWTP Sludge Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic (As)	75	41	5	5	6.67%	12.20%
Chromium (Cr)	3,000	1,200	35	35	1.15%	2.88%
Cadmium (Cd)	85	39	1	1	1.18%	2.56%
Copper (Cu)	4,300	1,500	653.7	653.7	15.20%	43.58%
Lead (Pb)	840	300	95.8	95.8	11.40%	31.93%
Mercury (Hg)	57	17	0.73	0.73	1.28%	4.29%
Molybdenum (Mo)	75	----	18.1	18.1	24.13%	
Nickel (Ni)	420	420	22.6	22.6	5.38%	5.38%
Selenium (Se)	100	36	39.8	39.8	39.80%	110.56%
Zinc (Zn)	7,500	2,800	1449	1449	19.32%	51.75%

As shown in the tables above, the city's sludge is well below both the ceiling and EQ levels for all metals except for selenium exceeding the exceptional quality in 2022 and 2023.

Table 5, 2022 Great Bend WWTP Sludge Quarterly Sample Results

	January 3	April 4	July 5	October 17
Arsenic (As)	4.7	4.9	4.5	4.4
Chromium (Cr)	1.2	1.4	1.3	2.1
Cadmium (Cd)	32.6	22.3	27	31.9
Copper (Cu)	709.2	650	650.2	641.3
Lead (Pb)	93.5	77.4	90.8	90.8
Mercury (Hg)	0.47	<0.62	<0.69	<.62
Molybdenum (Mo)	20.4	21	19	18.3
Nickel (Ni)	20	17.9	18.8	19.6
Selenium (Se)	36.9	37.6	37	35.9
Zinc (Zn)	1130	1075	1174	1257
Ammonia	42300	51800	57900	45800
TKN	96200	111000	118000	100000
pH	7.24	7.26	7.43	
Percent Solids	3.7	3.4	3.25	3.46
Nitrogen	5.4	5.9	6.2	<5.8
Orgic Nitrogen	53900	58800	59800	54200

Table 6, 2023 Great Bend WWTP Sludge Quarterly Sample Results

	January 13	April 10	July 10	October 25
Arsenic (As)	4.2	4.2	4.4	5
Chromium (Cr)	1.6	1.1	<1	1.6
Cadmium (Cd)	28.3	29.8	29.7	34.5
Copper (Cu)	583	539.4	630.3	653.7
Lead (Pb)	84.5	70.4	88.6	95.8
Mercury (Hg)	<.54	<.71	<.59	<.73

Molybdenum (Mo)	18.1	16.3	17.2	16.9
Nickel (Ni)	18.3	15.9	17.3	22.6
Selenium (Se)	36	36.5	38.3	39.8
Zinc (Zn)	1208	1110	1389	1449
Ammonia	39800	53200	57300	44700
TKN	96500	113000	115000	94800
pH	7.07	7.26	7.35	7.4
Percent Solids	3.7	3.35	3.2	3.41
Nitrogen	<5.4	6	<6.2	<5.9
Orgic Nitrogen	56700	59800	57500	53600

The city takes soil samples annually from each land application area they apply on that same year. The city also has approximately 539 acres available for land application. Records indicates that in 2022 they applied on 220 acres and in 2023 they applied on 320 acers.

Data Management

Overall, industrial files have all the necessary documentation as recommended by the Agency checklist. Each file consisted of permit and permit renewal applications, inspection reports, monitoring reports, and correspondence between the IPP and the industries. Records are well kept by April Batt and maintained at her office for more than three-year durations and are available for public review. Some records are also kept electronically.

Conclusion

Overall, the City of Great Bend's approved Industrial Pretreatment Program is well-established and implemented.

1. The city should ensure sampling of all industrial user regulated pollutants are sampled at least annually especially collecting pH sample during the annual compliance monitoring event of Doonan Specialized Trailer as required by 403.8(f)(2)(v).
2. The city should give the IPP Coordinator the opportunity to attend a formal Pretreatment training courses and should cross-train other qualified staff members to implement and operate the Pretreatment Program.
3. The city should submit the revised SUO and the ERP to the EPA and KDHE for formal review and formal approval.
4. The city should also ensure that the civil penalties amount, listed under Section 13.06.1220 (a) of the SUO, meet with the requirement of 40 CFR 403.8(f)(1)(vi)(A) to at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements".
5. The city needs to recalculate their mercury limit using the Kansas revised water quality standard.

NAJI AHMAD Digitally signed by NAJI AHMAD
Date: 2024.05.06 10:25:36 -05'00'

Naji J. Ahmad
Environmental Engineer, WB/DWIS

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Date: 2024.05.06
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Nicole Moran
Supervisor, WB/DWIS

Attachments

1. Checklist
2. Draft SUO
3. ERP
4. Sludge Data

**PCI****Approved
Pretreatment Program**Date(s): **March 26, 2024****FY 2024**

POTW:	CITY OF GREAT BEND, KANSAS	Date of last PCI/Audit:
Address:	P.O. BOX 1168 (WWTP 200 KIOWA ROAD)	9/20/2022
	GREAT BEND, KS 67530	NPDES Permit No.:
		KS0038491
Contact:	April L. Batt	State Permit No.:
Title:	Laboratory Technician/Environmental	M-UA16-OO01
Phone:	620 793 4170	Expiration Date:
Fax:	620 793 4173	12/31/2026
e-mail	abatt@greatbendks.net	

Participants

POTW: April L. Batt	Inspectors: Naji J. Ahmad, EPA Region 7 Steve Caspers, KDHE
Period covered by this PCI/Audit: 2022 & 2023	

POTW Information

Total for ALL Treatment Plants (MGD)			
Design Daily Ave. 3.6	Actual Daily Ave. 1.2	Design Peak: 7.2	% Industrial Flow: Less than 1%
Number of Plants: 1	% Combined Sewers:	Type of Treatment at Principal Plant: Activated Sludge	
Sludge Disposal Method: Land Application	Quantity (dry metric ton/year): 229 produced 185 Applied	Receiving Stream: Arkansas River	

PART I: PROGRAM BACKGROUND INFORMATION

I.A. Approved Modifications to the Original Program

1.

Date of last NPDES permit modification: 10/1/2006	Date of original Program approval:	01/08/2006
	Date NPDES Permit originally modified to require implementation [PTIM]:	10/2/2006

2. Approved Pretreatment Program modifications:

REQUIRED MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
PIRT SUO Revisions	1/8/2006	Need to include streamlining Rule	
List of SIUs [403.8(f)(6)]	1/8/2006		
Enforcement Response Plan	1/8/2006	Under revision	
DSS SUO Revisions	1/8/2006		
LOCAL LIMITS	12/10/2015		

3. Is the POTW presently working on any program modifications?

Yes. The city is reviewing their Sewer Use ordinance to incorporate the 2005 EPA streamlining Rule and revising the ERP as well.

4. Does the POTW have any program modifications currently being reviewed by the Approval Authority?

NO. However, both documents need approval by the EPA when submitted.

I.B. Approved Program Contents

5. Authority to enforce Pretreatment Standards contained in: **Ordinance No. 4121, Title 13, Chapter 13.06**

6. Date enacted or adopted: **08/16/2006**

7. Approved Control Mechanism: **PERMITS**

8. What is the frequency required by the **approved program**/modifications for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	NA*	1
POTW inspection of:	NA*	1
SIU self-monitoring:	NA*	2
SIU reporting:	NA*	2

9. What types of enforcement options are available through the approved program:

Y	Notice of Violation (NOV)
Y	Administrative Order (AO)
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
N	Fines; in at least \$1000/day/violation* [40 CFR 403.8(f)(1)(vi)(A)]
Y	Criminal Penalties
Y	Termination of Service

10. COMMENTS:

40 CFR 403.8(f)(1)(vi)(A) reads All POTWs shall have authority to seek or assess **civil or criminal penalties in at least the amount of \$1,000 a day** for each violation by Industrial Users of Pretreatment Standards and Requirements.

However, POTW: Sec. 13.06.1220. - Civil Penalties. (a) A user who has violated, or continues to violate, any provision of this chapter, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall be liable to the city **for a maximum civil penalty of \$1,000.00 per violation**, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.

Sec. 13.06.1230. - Criminal prosecution.

(a) A user who willfully or negligently violates any provision of this chapter, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall, upon conviction, be guilty of a misdemeanor, punishable by a fine of not more than \$2,500.00 per violation, per day, or imprisonment for not more than one year, or both.

(b) A user who willfully or negligently introduces any substance into the POTW which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor and be subject to a penalty of at least \$2,500.00 or be subject to imprisonment for not more than one year, or both. This penalty shall be in addition to any other cause of action for personal injury or property damage available under state law.

(c) A user who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to this chapter, wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this chapter shall, upon conviction, be punished by a fine of not more than \$1,000.00 per violation.

(d) In the event of a second conviction, a user shall be punished by a fine of not more than \$5,000.00 per violation.

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any Pretreatment modifications been made to the Sewer Use Ordinance since the last PCI/Audit that have not been approved by the Approval Authority. **NO**
12. List by name and location any SIUs that discharge to the POTW from outlying jurisdictions.
Doonan is located 2 miles from the city. The facility hauls its waste to City under a Permit.

Indicate which of the above are not covered by a contract/agreement requiring them to abide by the POTW's legal authority. **NA**

13. Does the POTW have the authority to seek fines in at least \$1000 per day? [403.8(f)(1)(vi)]
NO. Sec. 13.06.1220. - Civil Penalties. (a) A user who violates should be liable to the city for a maximum civil penalty of \$1,000.00 per violation, per day.
14. If the POTW has not yet developed an Enforcement Response Plan when does the POTW feel it will complete this requirement? **NA was developed in 2006. Currently working on revision to be submitted to KDHE and EPA for approval.**
15. COMMENTS:

II. B. Control Mechanism

16. General Information:

Type: PERMITS	Issued to Noncategorical SIUs? [DSS: 403.8(f)(2)(i)]
Duration: 4 years	

17. Do all SIUs have current (unexpired) control mechanisms? **{NOCM} YES**
18. List by name those that do not and indicate which ones have not had a current control mechanism for 180 days or more. **{RNC/SNC} NONE**

II.C. Hauled Wastes

19. Does the POTW accept hauled waste? (If "no," go to question 25)
Septic Haulers and 433 process waters from Doonan Specialized Trailers
- a. if so describe (include approx. no. of loads per month):
20 loads per month (3,000 gallons) from 2 permitted haulers
Doonan hauls 1,000 to 2,000 gallons per month.

- b. How does the POTW ensure that it does not accept hazardous waste?
Permits & sampling, visual observation. pH is checked randomly. However, the IPP did collected pH sample dunring the annual compliance monitoring event of Doonan Specialized Trailer in 2022 and 2023 as required by 403.8(f)(2)(v).

20. Does the POTW have a control mechanism for regulating waste haulers, and if so describe.
Annual permits. Currently the City has 2 active permits. In addition to Doonan.
21. Does the POTW have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
Describe: **YES. Receiving pit. The Pit has a valve to hold the received waste until sampling analysis are cleared.**
22. Are all applicable Categorical standards and Local Limits applied to IUs whose wastes are hauled to the POTW? **YES. Doonan has a permit as a CIU.**
23. Describe the method used to apply local limits to hauled waste. **Permits and local limits if needed.**

II.D. Industrial User Characterization

25. How often does the POTW update its Industrial Waste Survey (IWS) to identify new SIUs or changes to wastewater discharges? **Ongoing.**
- a. When was the last formal update: **2013.**
26. What is the POTW's current industrial base?

Current	Industrial User Type	Last Reported
3	Categorical SIUs {CIUS}	3
0	Non-Categorical SIUs	0
3	Total all SIUs {SIUS}	3

Comment:

- 1) **Hampton Hydraulics (GBI) (40 CFR 433) and Fuller Industries Inc. (40 CFR 455 & 433) are categorical industries but zero dischargers.**
- 2) **Doonan Specialized Trailer (40 CFR 433) is a CIU that hauls 1,000 to 2,000 gallons per month, not connected to city sewer.**

II.E. Local Limits

27. Does the POTW have numerical limits for metals in its NPDES permit? If so list the metals and the limits (or attach list). **NO**

28. Have there been any numerical NPDES permit violations in the last 12 months?

Ammonia due to mechanical failure.

a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through? **NO**

1. Was the interference traceable to an industrial user? **NO**

2. Was action taken that led to elimination within 90 days of the interference or pass through? **{SNC} NA**

3. Was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? **{SNC} If not, why? NA**

29. How many times per year does the POTW regularly sample its PRINCIPAL plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	4/Year	4/Year	4/Year
Toxic Organics	0	0	0
Biomonitoring		1/Year	
TCLP			0

30. List below the numerical value for the local limits derived by technical analysis. If a technical analysis was performed but the limit not adopted enter DNA in the block. (Values assumed to be mg/l unless otherwise noted). **{EVLL} {ADLL}. Maximum Allowable Headworks Loading (MAHL) and Maximum Allowable Industrial Loadings (MAIL)**

POLLUTANT	MAHL (lbs./day)	MAIL (lbs./day)	POLLUTANT	MAHL (lbs./day)	MAIL (lbs./day)
Arsenic (T)*	0.116	0.082	Mercury (T)	NONE ALLOWED	
Cadmium (T)	0.153	0.130	Molybdenum (T)	0.181	0.118
Cyanide	0.047	0.026	Nickel (T)	0.774	0.681
Chromium (T)	3.376	3.045	Selenium (T)	0.242	0.173
Copper (T)	1.513	0.561	Silver (T)	0.564	20.456
Lead (T)	0.423	0.188	Zinc (T)	4.25	2.601

31. Are the POTW's BOD and TSS limits technically derived (ie. based on plant capacity)? **YES.**

LL calculations showed that BOD is 41%, TSS is 49% and TKN is 64% of the WWTP capacity.

32. Are BOD and TSS violations treated as violations of technically based local limits?

YES

33. If there is more than one treatment plant, were the local limits established specifically for each plant?

NA

34. Has the POTW made any changes to its Local Limits which have not been approved, and if so provide details? [403.18] **NO. Local limits were approved in 2015.**

35. Has the POTW granted any Net/Gross allowances under 403.15? **NO**

II.F. Standards and Requirements for Industrial Users

37. Does the POTW compare local limits against federal Categorical standards and apply the most stringent standards to Categorical IUs? [403.4] **YES.**

38. Has the POTW notified its IUs of possible RCRA obligations? [40 CFR 403.8(f)(2)] **YES**

39. Does the POTW allow Categorical users to use Solvent Management Plans/certification or surrogate test procedures to meet TTO requirements? **YES**

II.G. POTW Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Non-Categorical SIUs	Categorical SIUs
POTW sampling of:	NA	1/year
POTW inspection of:	NA	1/Year
SIU self-monitoring:	NA	4/Year
SIU reporting:	NA	2/Year

42. List those SIUs that were not sampled by the POTW within the last 12 months. [DSS: 403.8(f)(2)(v)]

Hampton Hydraulics (GBI) is zero discharge facility.

Fuller Brush Company are zero discharger signed nondischarging certificate for all 2023.

Doonan was sampled in 2023. Except for PH.

43. List those SIUs that were not inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] **NONE.**

44. How many industries were neither sampled nor inspected within the last 12 months. [DSS: 403.8(f)(2)(v)]
{NOIN}{RNC/SNC} NA

45. Does the POTW sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)]

NO. city did not sample Donnan for pH

46. Sample/Analysis Procedures:

Chain-of-Custody always used? YES	Sampling method, metals: GRAB
Ability to sample on short notice? YES	Sampling method, CN: GRAB
In-house analysis of toxic pollutants: NO	Sampling method, O&G: GRAB
Do in-house analytical methods conform to 40 CFR part 136? YES	

47. How does the POTW document its industrial user inspections? **Checklist.**

48. Does the POTW evaluate all SIUs at least every two years to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)] **YES.**

- a. Describe the method used by the POTW to evaluate the need for a slug control plan:
Annual inspection

II.H. IU Self Monitoring and Reporting

49. Are all Categorical IUs required to self-monitor for all pollutants regulated by the respective Categorical standard at least twice per year? [403.12(e)] **YES.**

Except Hampton Hydraulics (GBI) and Fuller Brush Company are zero dischargers.

50. Were any Baseline Monitoring Reports or 90 day Compliance Reports due within the past 12 months? If so, from whom? Were the reports submitted? **NO.**

51. Are IUs required to report spills, slug discharges, etc. to the POTW? [403.12(f)] **YES**

52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] **YES**

53. Are IUs required to resample and submit results within 30 days following a violation as per 403.12(g)(2)? **YES**

II.I. Data Management

54. Are files/records computerized? **Both**

55. Are all records maintained for at least 3 years? [403.12(o)] **YES**

56. Are program records available to the public as required by 40 CFR 403.14(b)? **YES**

57. Does the POTW have provisions to address confidential business information? [403.14(a)] **YES**

58. How is compliance status calculated? Describe the procedure used in determining Significant Noncompliance (eg. are mo. avg. violations considered as well as daily max?). **Following the EPA definition.**

II.J. Program Resources

59. What percent of the Pretreatment Coordinator's time is spent on pretreatment?
Usually, PC 20%

60. What computer programs does the POTW use for:

Word-processing:	MS WORD
Spreadsheet:	MS EXCEL
Database:	

60. Does the POTW believe its annual budget adequate for implementation? **YES @ \$3,500.00/year**

- a. If not, is the level of money available for pretreatment less than that in the approved program or approved modification?

II.K. Special Questions

62. Are there any issues that the POTW would like to discuss?

PART III: FILE AND RECORDS REVIEW

Following is a table containing the POTW's Significant Industrial User inventory regulated by its Pretreatment Program. Please verify that all information in the table is correct and current. For those industries no longer regulated draw a line through the entry. Add all new industries and provide the information sought by the table. Below is a guide to the information sought by the table and suggested abbreviations.

INDUSTRY:

Provide the name of each industrial user regulated under the pretreatment program.

CAT STND:

Provide the categorical standard code number. For example, industries subject to the Metal Finishing regulation should be designated "433." For noncategorical industries indicate "NA" in this column.

REG PROCESS:

Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to Metal Finishing regulations because it performs zinc and chromium plating indicate with "ZnCrPL" or a similar abbreviation.

TMT:

If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE:

Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precip/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG FLOW:

Provide the industry's average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1000.

TOT FLOW:

Provide the average daily total plant flow in gallons per day.

CWF:

Indicate if the industry uses the Combined Wastestream Formula to determine compliance with categorical standards. "Y" = yes, "N" = no.

COMPLIANCE STATUS FOR THE 6 MO PERIOD ENDING:

For the six month periods listed, indicate if the industry's compliance status. Use the following abbreviations:

CIn compliance with all standards: no violations.

IInfrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.

SNC,SIn significant noncompliance with discharge standards.

SNC,RIn significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.

SNC,MIn significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.

SNC,C Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by the city

SECTION VII: SIGNIFICANT INDUSTRIAL USERS

Industry Name	Cat. Stnd.	Reg. Process	T M T	Type	Reg. Flow	Total Flow	C W F	Compliance Status for Six Month Period Ending:				Last Inspection
								Jun 23	Dec 22	Jun 23	Dec 23	
Doonan Specialized Trailer LLC	433	Chemical itching	Y	Sediment Filtration	*	*	N	C	C	C	C	11/2/2023
Fuller Brush Company	433, 455	Conv Coat, Pest Repac	N	NA**	0	4624	N	I-R	C	C	C	11/14/2023
Hampton Hydraulics (GBI)	433	Conv Coat	N	NA**	0	837	N	C	C	C	C	11/01/2023

*Haul 1,000 to 2,000 gallons per month, not connected to city sewer.

** currently not discharging

III.B. Significant Industrial User Compliance Evaluation

63. From the above list of industries, how many are in Significant Noncompliance (SNC) with either discharge standards or reporting requirements based on the most recent six-month reporting period? **{PSNC} NONE**

64. List by name, those industries currently on a compliance schedule. Complete the table below. **NONE**

Industry Name	Date Schedule Issued	Compliance Deadline	How Administered*

eg. Administrative Order, Permit, etc.

65. List those industries last published in the newspaper for noncompliance and provide the date (or attach a copy of the public notice). **NONE**

66. If an industry has been deleted from the list of Significant Industrial Users list by name below and provide the reason. **NONE**

67. For those industries in SNC within the last 12 months complete the following table for all written enforcement actions. **NONE**

IU Name	Violation	Date of POTW knowledge	Date of Action	Enforcement Action	ERP required action

68. Provide the total number of NOV's, Administrative actions, Judicial referrals, and criminal prosecutions that occurred in the last twelve months. **{FENF} {JUDI} NONE**

69. Were all actions taken by the POTW within 30 days of knowledge of a violation? **{RNC/SNC} NONE**

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the POTW within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the POTW) of the violation? **{RNC/SNC} NONE**

III.C. Control Mechanism Evaluation

71. Do the POTWs control mechanisms: Permittee: **Hampton Hydraulic (GBI)**

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (no > 5 yrs.):	Y	Cite the POTW's legal authority:	Y
Contain the correct discharge limits:	Y	Identify TTO alternatives, if applicable:	Y
Specify sample type for IU self monitoring:	Y	Require notification within 24 hrs of a violation:	Y
Adequately identify sampling location:	Y	Require resample/report in 30 days of violation:	Y
Specify sampling frequency:	Y	Specify right of entry:	Y
State applicability of civil or criminal penalties:	Y	Reserve right to revoke permit:	Y
Stipulate reporting frequency:	Y	Specify immediate slug load notification:	Y
Properly require records retention:	Y	Require submission of all sampling results:	Y
Specify limited transferability:	Y		

Result of this review from the last PCI/audit: **Hampton Hydraulic (GBI) will have to modify their permit to include AEI Tube Washer as an additional outfall.**

III.D. Industrial Inspection Evaluation

72. Do the Industrial Inspection reports contain? **Donnan Specialized Trailer**

Name of Company contact:	Y	Evaluation of IU's monitoring procedures:	Y
Date of inspection:	Y	Verification of wastewater flow rates:	Y
Time of inspection:	Y	Determination of applicability of the CWF:	Y
Description of manufacturing process:	Y	Description of the chemical storage area:	Y
Description of treatment process, if any:	Y	Identification of potential spill conditions:	Y
Evaluation of IU's monitoring methods:	Y		
Verification of production rates that would affect production based standard:			NA

The city did not sample Donnan for pH in 2022 and 2023.

III.E. Slug Discharge Control Procedures

73. If the POTW has required the submittal of a Slug Control Plan does it contain: [DSS: 403.8(f)(2)(v)]

- _____ A description of discharge practices including non-routine batch discharges
- _____ A description of stored chemicals
- _____ Procedures for immediate notification of slug discharges with written follow-up notification
- _____ Procedures necessary to prevent adverse effects at the POTW's treatment plant:
 - _____ inspection and maintenance of storage areas
 - _____ handling and transfer of materials
 - _____ loading and unloading operations
 - _____ control of plant site runoff
 - _____ worker training
 - _____ building of containment structures
 - _____ measures for the control of toxic organics
 - _____ measures for emergency response

74. COMMENTS:

Hampton Hydraulic (GBI) does not need a SCP but submitted one in 2021.

Fuller Brush Company needed one but submitted a SPCC plan which is required under 112 not 403.

III.F. Industrial User File Review Checklists

Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the POTW's Significant Industrial Users. When reviewing SIU files priority should be placed on Categorical industries that either have a history of violations or that appear to be in compliance but have not installed that prescribed BAT technology to consistently meet discharge limits. While only three pages are provided the reviewer is encouraged to copy and add additional review pages for larger POTWs.

Industry Name: **Doonan Specialized Trailer LLC**
Principal Pollutants: **40 CFR 433**
Products: **Aluminum/ steel trailers**

SIC **3715**
No. of Employees: **83**

A. Does the file system for the industrial user contain:

☒ Y Permit application 11/7/2016	☒ Y POTW sampling results (pH)
☒ Y Current Permit 12/6/2022-12/31/2026	☐ Y Self-monitoring reports
☒ Y Correct limits in Permit	☐ NA Enforcement documentation
☒ Y Correspondence/meeting notes/phone log	☒ Y Solvent Management Plan 4/19/2016
☒ Y Most recent inspection report	☐ NA Correct application of the CWF
☒ Y Evaluation for need for Slug control	☐ NA Slug Control Plan No Discharge
☐ Y Compliance status determination	

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**

☐ Immediate notification by the IU	☐ Follow-up written notification
☐ POTW response	☐ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU **_1/year_** Inspect the IU **_1/year_**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year?

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year?

F. Frequency in the IU's control mechanism for: Self-monitoring **_4/year_** Reporting **_2/year_**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?

H. Did the POTW identify all IU violations from:

IU Self-monitoring **_NA_** POTW Compliance monitoring **_NA_**

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? **Compliance**

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of</u>	<u>Date of</u>	<u>Date of</u>	<u>ERP</u>	<u>POTW</u>
	<u>Violation</u>	<u>POTW</u>	<u>POTW</u>	<u>Required</u>	<u>Response</u>
		<u>Knowledge</u>	<u>Response</u>	<u>Response</u>	<u>Response</u>
No Violations					

Industry Name: **Hampton Hydraulics (GBI)**
Principal Pollutants: **40 CFR 433**
Products: **commercial/industrial Hydraulics**

Zero Discharge
No. of Employees: **60**

A. Does the file system for the industrial user contain:

☒ Y Permit application	☒ NA POTW sampling results (zero Discharge)
☒ Y Current Permit	☒ Y Self-monitoring reports
☒ Y Correct limits in Permit	☒ NA Enforcement documentation
☒ Y Correspondence/meeting notes/phone log	☒ Y Solvent Management Plan
☒ Y Most recent inspection report	☒ NA Correct application of the CWF
☒ Y Evaluation for need for Slug control	☒ Y Slug Control Plan No Discharge (2021)
 ☒ Y Compliance status determination	

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**

☒ Immediate notification by the IU	☒ Follow-up written notification
☒ POTW response	☒ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU **1/year** Inspect the IU **1/year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year?

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year?

F. Frequency in the IU's control mechanism for: Self-monitoring **4/year** Reporting **2/year**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?

H. Did the POTW identify all IU violations from:

IU Self-monitoring **NA** POTW Compliance monitoring **NA**

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? **Compliance**

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
No Violations					

Industry Name: **Fuller Brush Company**

Zero Discharge

Principal Pollutants: **40 CFR 433 and 455**

No. of Employees: **120**

Products: **cleaning products/Brushes/Hand soaps/sanitizers/dispensers**

A. Does the file system for the industrial user contain:

☐ Y Permit application	☐ NA POTW sampling results (zero Discharge)
☐ Y Current Permit	☐ Y Self-monitoring reports
☐ Y Correct limits in Permit	☐ NA Enforcement documentation
☐ Y Correspondence/meeting notes/phone log	☐ Y Solvent Management Plan
☐ Y Most recent inspection report	☐ NA Correct application of the CWF
☐ Y Evaluation for need for Slug control	☐ Y Slug Control Plan (SPCC)
 ☐ Y Compliance status determination	

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**

☐ Immediate notification by the IU	☐ Follow-up written notification
☐ POTW response	☐ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU **1/year** Inspect the IU **1/year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year?

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year?

F. Frequency in the IU's control mechanism for: Self-monitoring **4/year** Reporting **2/year**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?

H. Did the POTW identify all IU violations from:

IU Self-monitoring **NA** POTW Compliance monitoring **NA**

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? **Compliance**

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
No Violations					