NPDES Pretreatment Categorical Industrial User Inspection
Coil Coating-Can Making Point Source Category; 40 CFR Part 465

National Database Information	
Inspection Type	Pretreatment Categorical Industrial User (CIU)
NPDES ID Number	COPF00102
Inspection ID	202103_COPF00102
Inspection Date	March 3-5, 2021 - Remote
Entry Time	March 3, 2021 @0800
Exit Time	March 5, 2021 @1030

General	
Inspector Name	Al Garcia
Telephone	303.312.6382
Inspector Type	EPA Region 8
Inspector Name	Kristin Ratajczak
Telephone	303.312.6310
Inspector Type	EPA Region 8

Facility Location Information	
Business Name	Metal Container Corporation
Facility Location	1201 Metal Container Court, Windsor, CO 80550
Mailing Address	1201 Metal Container Court, Windsor, CO 80550
Type of Business/Operations	Can making facility
Average Production Rate	5.6 million cans per day
Number of Employees	112
Days of Operation	365 days per year, 24 hours per day; about 3 days of no production due to annual maintenance/cleaning
Type/Number of Shifts	Two 12-hour shifts

Facility Representatives

Name	Title	Contact Information
Tasha Greene	Environmental Health and Safety Manager	Tasha.greene@anheiser-busch.com; 970.381.4274
Devin Bjorneboe	Quality Environmental Coordinator	devin.bjorneboe@anheiser-busch.com
Gary Beckman	Waste Treatment	Opening interview
Maurice Cashman	Plant Manager	Opening interview
Jordan Muscat	Production Manager	Closing conference

POTW/Receiving Water	
Publicly Owned Treatment Works (POTW) and Permit Number	Town of Windsor POTW; CO-0020320
Ultimate Receiving Water(s)	Cache La Poudre River

General Inspection and Facility Information
Inspection Description
The U.S. Environmental Protection Agency (EPA) conducted a remote facility inspection at Metal Container Corporation (Metal Container or the facility), in lieu of an on-site facility inspection, in response to concerns related to the COVID-19 pandemic. The remote facility inspection contained elements of a typical onsite inspection with the exception of a visual walk through of the operations and processes at the facility. The remote inspection, hosted on the Zoom platform, started on March 3, 2021 at 0800 with an opening interview. Pretreatment records were reviewed, and a closing conference was held on March 5, 2021 at 0900. Because the facility inspection was held remotely, EPA did not take digital photos to capture current conditions of the facility's operations and processes. EPA provided the facility with photo logs developed during 2016 and 2018 on-site inspections and the facility confirmed that there were no changes. In addition, the facility provided EPA with current photos of the requested chemical storage areas and day tank storage of supply chemicals. Information regarding tank capacities and counter-current flows in the can-washing process lines were provided by the facility during follow-up emails during the inspection and on March 19, 2021. The EPA inspectors, Al Garcia and Kristin Ratajczak (jointly referred to as inspectors) interviewed Ms. Tasha Greene, Mr. Devin Bjorneboe, and Mr. Gary Beckman about the facility and the associated operations/processes starting with the raw materials/chemicals through the finished products, including the management or treatment of discharged and non-discharged wastestreams. After the opening interview, the EPA reviewed applicable records and a closing conference was held to discuss the findings and observations of the facility inspection. In addition, the EPA provided outreach regarding the applicable Pretreatment Regulations and projections of the control mechanism that will be issued by the EPA.

Chemicals/ Raw Materials Overview			
Chemical/Raw Material	**Volume/Mass**	**Storage Location**	**Process Use**
Bonderite L-FM 340B Bodymaker Coolant	10,000-gallon tank pumped into a 60-gallon day tank (about 18 gallons used /shift)	Tank farm Day tank on process floor	Bodymaker process line
Mobilgear 600 XP 220 Bodymaker Lube	10,000-gallon tank	Tank Farm	Bodymaker process line
DTI SNL 2 Cupper Lubricant	Six 330-gallon totes transferred to a 650-gallon bulk tank. The bulk tank is pumped to a 400-gallon day tank for process use.	Tank Farm Day tank on process floor	Cupper process line
Lubrication and Hydraulic Oil	55-gallon and 75-gallon drums contained in a dispensing rack system	Oil drum storage room	Process machinery
Inside Spray	10,000-gallon tank	Tank Farm	Inside Spray Process lines
Metal deco ink	Ink containers	Ink storage rack room	printers

Sulfuric Acid (surfactant)	10,000-gallon tank pumped to a 500-gallon day tank	Tank farm Day tank in wastewater treatment system area	Washer
Sulfuric acid (H_2SO_4)	55-gallon drums transferred into a day tank; 6 drums delivered weekly	Wastewater treatment area	Wastewater treatment
Hydrochloric Acid (HCl)	55-gallon drums (about 1 drum used/6 days)	Chemical Storage	Regen acid for DI column maintenance
Hydrofluoric acid (HF)	330-gallon totes pumped to a day tank (about 20-gallons used per shift)	Chemical storage Day tank on process floor	Washer
Overvarnish	10,000-gallon tank pumped to printer reservoirs	Tank farm	Printers
Mobility Enhancer-ME50	Drums pumped into 15-gallon day tank	Chemical storage Day tank on process floor	Washer
Calcium hydroxide (lime)	Lime silo (powder form)	Mix tank in waste treatment	Wastewater treatment

Evaluation of Slug Discharge and Spill Potential

Floor Drains in Storage Areas? A visual walkthrough was not performed – not evaluated

Photo Log (Attachment 1):

A photo log was generated with photos provided by the facility and is used in this inspection report to provide examples of spill containment and other measures in the chemical storage rooms and tank farm. In addition, the photo log provides examples of pumps and day tanks used for chemical handling and transfer to the process lines and machinery. The pumps and day tanks are examples of measures in place at the facility to minimize the potential of spills. The photos contained in the photo log consist of the following areas:

- Photo 1 -Bodymaker Lube day tank
- Photo 2 -Bulk tank farm, including secondary containment
- Photo 3 -Cupper Lube day tank
- Photo 4 -Caustic drum storage
- Photo 5 -Hydrochloric drum storage
- Photo 6 -Sulfuric Acid drum storage
- Photo 7 -Hydrofluoric Acid pumps and metering system
- Photo 8 -Ink storage racks

Description of Chemical Handling/Transfer to Process Operations:

The bulk chemicals used at the facility are stored in either 10,000-gallon bulk tanks or 330-gallon totes and are transferred to day tanks of various sizes for daily production use or in the case of coolant or lubricants, pumped by demand into reservoirs of machinery throughout the facility. It appears that based on the spill containment plan and information gathered during the remote interviews, the facility has measures and procedures in place to ensure appropriate receipt, storage, handling, and transfer of supply chemicals.

Potential for Spills or Slug Discharges from Chemical Storage/Handling/Transfer to reach Sanitary Sewer? ☒ **yes** ☐ **no**

Describe Spill or Slug Discharge Potential:

Spills and non-routine episodic slug discharges inadequately treated/profiled have the potential to pass through the treatment system and reach the Town of Windsor's sanitary sewer. The facility has developed a slug discharge control plan (SDCP) that addresses management of spills. However, the SDCP needs to be updated to address procedures and worker training to ensure that spills that occur in the chemical storage areas, including the process floor are adequately profiled and disposed off-site or are adequately treated in the facility's treatment system. In addition, the SDCP needs to be updated to identify procedures and worker training to minimize the potential slug discharge of oil from the dewatering performed in the Split tanks A, B, and the waste oil tank.

The SDCP also needs to be updated to include potential slug discharges from non-routine, episodic discharges. EPA identified the following unit operations in which a slug discharge can potentially occur, due to inadequate discharge practices or inadequate treatment:

- Chemical tanks in the Can Washing process lines
  - Stage 1 – Sulfuric Acid
  - Stage 2 – Hydrofluoric Acid
  - Stage 3 – Chlorinated City Water
  - Stage 4 – Sulfuric Acid
  - Stage 5 – ME50 solution with DI water
- Schneider Oil Filtration System
- Other episodic wastestream generation due to annual cleaning/maintenance activities of equipment or process lines
- City Water Supply DI treatment – Regeneration and Backwash wastewaters

The SDCP should be updated to include an identification of the slug discharge potential from process lines and equipment, an evaluation of the type of waste (hazardous waste, non-hazardous waste/regulated, wastewater to be treated), disposal and discharge/treatment practices to minimize the potential for slug discharges to reach the sanitary sewer. (e.g., an evaluation of the waste treatment capabilities or hydraulic capacity to adequately treat the episodic discharge)

Process/Operations

Describe the facility industrial process.

1.0 – Water Supply Treatment

The facility treats incoming City water for use in stages five and six of the can-washing process lines. The City water is first treated through a carbon filter tank. The water is then sent through anion/cation tanks in series, (anion tank with resin to remove negatively charged ions and cation tank with resin to remove positively charged ions). The treated deionized (DI) water is collected in a supply tank and plumbed to the can washer process lines, as needed.

The anion/cation resin tanks are backwashed every five to seven days using HCl) and sodium hydroxide (NaOH). The backwash cycle for the cation tank is 2,000 gallons of water, followed by 50 gallons of HCl solution and rinse cycles. The backwash cycle for the anion tank is similar except that 50 gallons of NaOH is used instead of HCl. The wastewater from the backwash cycle is collected in a 10,000-gallon demin backwash tank and is sent to waste treatment, averaging 1,500 gallons twice to four times per month in calendar year 2020.

The resins are regenerated about six times per month and the regeneration cycle generates an average of 6,208 gallons of wastewater per regeneration event, according to a review of the 2020 flow records. The regeneration wastewater is also collected in the 10,000-gallon demin backwash tank and sent to waste treatment. The resin columns are replaced about every three years and are profiled and shipped offsite to Waste Management.

2.0 – Manufacturing process

The facility makes aluminum beverage cans (70% beer and 30% soda) with an average daily production rate of 5.6 million cans per day. The facility receives 25,000 lb. coils of aluminum that are stored on pallets at the beginning of the process. There are approximately 12 coils in the facility and about four coils in process during an average production day. The coils are laid on their side and loaded into the uncoiler machine that uncoils the aluminum and an applicator roll lubricates the straightened aluminum prior to stamping. The facility maintains a 400-gallon day tank of cupper lubricant that is gravity fed to the uncoiler machine, as needed.

The facility operates two production lines in parallel, beginning with a hydraulic press that stamps out blanks from the uncoiled aluminum and a die to form cups out of the blanks. The clean scrap metal from the cupping process is collected through a vacuum and put through a cyclone to get rid of excess oils. The scrap metal is baled into 40 lb. bricks and shipped to the supplier for recycling. The cups are conveyed overhead to two parallel drawing and ironing process lines, each process lines consists of seven individual body maker machines. The body maker machines perform the drawing and ironing (forming straight walls) on the cups to form a can.

The body maker machines are supplied with coolant contained in an 8,000-gallon sump. The coolant is supplied to the bodymaker machines and returned to the Schneider oil filtration system where it passes through a series of 12 to 16 paper filters for reclamation prior to entering the 8,000-gallon sump for reuse. The paper filters are changed every five days and disposed in the trash. The Schneider oil sump is cleaned annually during production shut down days. The tramp oil is skimmed from the sump and is sent to waste treatment.

The formed, straight-wall cans from the bodymaker process lines are trimmed to a finished height. The scrap metal is collected and baled with other scrap metal. The trimmed cans enter a large conveyance trench that runs underneath both drawing and ironing lines. The trench conveys the cans to the washing process. The conveyance trench for the cans running underneath the body maker machines also act to contain any oil leaked from the machines. The trench connects to a pit for collection and treatment.

The cans in the conveyance trench are loaded into the two parallel can spray washing process lines with identical configurations and tanks. The cans are inverted as they enter the process lines to aid in draining the solutions and spray rinses in the process lines. The inverted cans are prewashed using a low-pressure spray and water contained in the trench to provide an initial rinse of oil and coolants. The trench is located below each can-washing line and collects wastewater from the cleaning process.

The can-washing process lines consist of the following stages, with each stage containing 50 psi spray nozzles to clean the interior of the cans:

1. H_2SO_4, pH of 1.8, heated spray, cleaning/etch tank

    a. The H_2SO_4 solution is contained in a 500-gallon day tank for each line. The day tank supplies spray nozzles for application; The H_2SO_4 solution drips back into the tank following use. Stage one is a closed loop that continuously overflows equipped with a weir and oil skimmer to manage contaminant levels of coolant and oils. The skimmed waste from the weir and skimmer is directed to the trench. Makeup water due to evaporation loss is added from stage three of the process line. This process tank is cleaned every 16 weeks.
2. HF (30%) in solution with H_2SO_4 surfactant cleaner, heated spray, cleaning/etching tank
    a. The HF- H_2SO_4 solution is contained in a 1,000-gallon tank that supplies spray nozzles. Stage two is a closed loop equipped with a weir and oil skimmer to manage contaminant levels of coolant and oils. The skimmed waste from the weir and skimmer is directed to the trench. Makeup water due to evaporation loss is added from stage three. This process tank is cleaned out about once or twice per year.
3. Bromine city water, spray, rinse tank

   The brominated city water is contained in a 500-gallon tank that supplies spray nozzles. This is the dirtiest rinse on the line because in this stage, the goal is to reduce the amount of residual contamination carryover from the cans as much as possible before they move into the clean water rinses of stages four and five. This stage is a single pass-through and flows directly to the trench after cleaning the cans. The makeup water due to evaporation loss is sourced from stage five countercurrent flow. Because the water in this stage is brominated, it is checked four times/shift.
4. H_2SO_4 in solution with city water, pH of 4.5, spray, rinse tank

   The H_2SO_4 solution is contained in a 500-gallon tank that supplies spray nozzles. Stage two is a closed loop system and makeup tap water supply is first used as seal water for the stage one and stage two pumps before being plumbed to stage four as supply rinse water.
5. DI water, spray, rinse tank

   The DI water in stage five is contained in a 500-gallon tank that supplies spray nozzles. The DI water generated by the in-house DI system is used in this stage. This stage is single pass-through. After one rinse, the DI water flows countercurrent to stage three.
6. DI water with mobility enhancer (ME50), spray, rinse and lubrication –

   The solution of DI water and ME50 is contained in a 300-gallon tank that supplies spray nozzles. Mobility Enhancer is added to DI water for use. The wastewater from this stage continuously overflows directly to the trench after single cleaning cycle of the cans. Volume is maintained by the drag-out water on cans from stage five.
7. The washed cans are dried in a natural gas oven.

The can washing process lines discharges waste rinsewaters from stages three and six, as well as skimmed oils and coolants from stages one and two. The generated wastewater from each can washing line is collected in trenches surrounding the washing lines. The wastewater in the conveyance trench drains to a 10,000-gallon below-grade sump. The wastewater in the sump is pumped to tank CE2 located in the wastewater treatment area.

The washed cans are air conveyed to the two printer lines. The printers have a capability of applying six runs of ink colors, but a typical run consists of three to four colors. The colors are applied on the can from light to dark. The ink is supplied with pots located next to the printers and is applied to the cans through ink plates loaded onto the printer. The change-over from the ink production run is engineered logistically to minimize the need to waste ink and clean ink lines. Manual cleanup is performed with isopropyl alcohol and rags. The waste ink generated is captured in satellite accumulation waste containers and collected in drums as a characteristic flammable hazardous waste. About one drum/three months is transported by Veolia.

After the printer ink application, an overvarnish is applied to the top and bottom of the cans before the coatings are cured in an oven. The cured cans are conveyed to the inside spray process to apply an epoxy spray on the inside of the cans to provide separation from the beverage product and the aluminum. The facility has thirteen inside spray machines on two lines to provide the inside spray application. For each machine, two application spray guns at different depths for the cans apply even coverage throughout the interior of the can. After the inside spray process, the cans are sent to an oven to cure the epoxy spray. The waste epoxy spray is captured as non-hazardous regulated waste.

A necker wax is applied on the top cut edge of the cans, which are then conveyed to the necker process line. The necker wax is heated in an 8-gallon tank, that needs to be resupplied every two days. The facility has two parallel necker process lines that each consists of ten stages to draw out the neck of the can and about 20,000 cans per minute are run through the necker process lines. The cans are then flanged and the base is reformed in the inside base profile reformer to add strength during the filling of the can. A date/time code is applied on the cans.

The quality control/quality assurance process consists of inspection through a light tester to identify defects in the can and a Mixed Label Detector (MLD) where cans are checked for label inconsistencies. The cans that fail these tests are kicked out of the process line and collected as scrap metal. A vision system/Auto Enamel (AER) quality control step is performed to detect imperfections such as creases or dents in the cans. Sodium peroxide is also used to detect exposed metal in the cans. The finished cans are sent through a conveyor line to the warehouse for palletizing and storage.

3.0 – Non-regulated Wastestreams

The custodial staff cleans and mops the floors five days a week during the first shift. The wastewater from floor cleaning is discharged to the process wastewater treatment system through the sump located near the can-washing process lines. The flow contributed by mop water is less than 50 gpd. In addition, hand sinks are installed in the process floor; the wastewater is discharged to the process wastewater treatment system with a volume of less than 50 gpd.

The cooling tower for the facility contains corrosion inhibitors. The return on the cooling system throughout the facility is returned to a tank that is blown down based on a certain level of conductivity; the cooling tower blowdown is discharged to the process wastewater treatment system. Based on a review of the flow records, the blowdown from the cooling tower occurs at a rate of about 1,116 gpd for 2020.

Backwash and regeneration wastewater from the DI Treatment System described in Section 1.0. In 2020, the facility discharged DI backwash wastewater about two to four times per month with an average volume of 1,500 gallons per event and DI regeneration wastewater about six times per month with an average volume of 6,208 gallons per event.

Describe any substantial changes in manufacturing processes (or planned changes):	NA
Did these changes result in substantial change in wastewater?	NA

Were these substantial changes reported, as required in 40 CFR 403.12(j)?	NA

Wastewater Treatment/Managment

Describe the wastewater treatment system or wastewater management:

4.0 – Waste Treatment

The facility's wastewater treatment system consists of six collection tanks, a five-stage reactor batch treatment system, and a clarifier. The facility has three processes wastewater collection tanks (CE 1, CE 2, and CE 3), two oil collection tanks (Oil Split A and Split B), Used Oil Tank, and a Waste Solids tank. The capacities of these tanks are the following:

- Split A — Wastewater Treatment – 1st floor — 10,000 gallons
- Split B — Wastewater Treatment – 1st floor — 10,000 gallons
- Used Oil Tank — Bulk Tank Area — 10,000 gallons
- Waste Solids Tank — Wastewater Treatment – 1st floor — 13,000 gallons
- CE1 — Wastewater Treatment – 1st floor — 13,000 gallons
- CE2 — Wastewater Treatment – 1st floor — 13,000 gallons
- CE3 — Wastewater Treatment – 1st floor — 13,000 gallons
- Reactor Stage 1 — Wastewater Treatment – 2nd floor — 2,500 gallons
- Reactor Stage 2 — Wastewater Treatment– 2nd floor — 2,500 gallons
- Reactor Stage 3 — Wastewater Treatment– 2nd floor — 2,500 gallons
- Reactor Stage 4 — Wastewater Treatment– 2nd floor — 2,500 gallons

The CE tanks act as wastewater collection and equalization. Tank CE2 is the primary wastewater collection tank with CE1 used for overflow. CE3 tank is rarely used but can act as extra storage. The wastewater in the CE tanks are sent to the four-baffled, four-stage reactor batch treatment tank. The stages of the reactor batch tank are as follows:

1. Acid break stage (H_2SO_4, pH of 1.8) – acid added to crack/break the oil, contents are mixed
2. Oil skimming stage with a rope mop – skimmed oil is collected in a pan and sent to the Oil Split A tank – waste oil treatment/management described in section 4.1
3. Retention stage.
4. Lime addition stage (pH of 8.8 to 9.0) - solids precipitation, - bulk lime is stored in a lime storage tank.
5. Retention stage- mixing and contact time, additional lime addition if needed.

The wastewater from the final reactor batch tank is sent to the clarifier. Polymer stored in a 600-gallon day tank is metered into the clarifier to aid in solids formation/precipitation. The solids accumulate on the bottom and are collected in a sump that is pumped to a 13,000-gallon waste solids tank. The scum that accumulates on the top of the clarifier is raked, collected in a sump, and sent to the first stage of the reactor batch tank. A continuous pH monitoring meter is installed in the weir overflow to the effluent trough leading to the discharge pipe from the clarifier and to the POTW. The facility has installed an audible alarm that is triggered at a high pH set point of 9.4 and a low pH setpoint of 6.5. The wastewater treatment operator will manually shut off flow and investigate the cause of the high or low pH. The facility continuously measures flow at the clarifier outfall.

The solids in the Waste Solids tank are pumped to the 44-plate filter press. The filtrate from the filter press is sent back to the clarifier. The solids are pressed, collected, and hauled off site by Waste Management as non-hazardous landfill cover. Based on a review of records, the facility generates about a 20 cubic yard dumpster of sludge per week.

4.1 – Waste Oil Treatment/Management

The skimmed oil from the reactor batch tank two and tramp or skimmed oil from the Schneider Oil Filter system are collected in Oil Split A tank. H_2SO_4 is added to the contents of the tank to a pH of 1.8 with an air sparge to crack the oil. The contents of the Oil Split A tank are allowed to quiesce for three to four hours to allow for oil separation. The tank is dewatered by using a sight glass to determine the oil/water fraction. The water fraction is pumped to the CE2 tank and the oily fraction is sent to the Oil Split B tank.

The Oil Split B tank is heated to 140˚F and provides further separation of the oil/water fraction. Oil Split B tank is dewatered using a similar process for Oil Split A; the water fraction is pumped to the CE2 tank and the oil fraction is sent to the waste oil tank. A final dewatering occurs in the waste oil tank; however, the water is sent to Oil Split A tank for reprocessing through the oil separation treatment. The contents of the waste oil are hauled offsite by Waste Management.

Are all treatment units functioning? *Not evaluated during remote inspection* ☐yes ☐no

Bypasses or emergency overflows from the treatment system? *Not evaluated during remote inspection* ☐yes ☐no

Applicable Regulated Operation(s) 465.01	
Operations	**Description**
Coil Coating **40 CFR 465.02** "Coil" means a strip of basis material rolled into a roll for handling. "Coil coating" means the process of converting basis material strip into coated stock. Usually cleaning, conversion coating, and painting are performed on the basis material. This regulation covers processes which perform any two or more of the three operations.	**Basis Material[1]:** Subpart A (465.10)– steel Subpart B (465.20)– galvanized Subpart C (465.30) – aluminum NA

Can Making Subpart D (465.40) Manufacturing of seamless can bodies, which are washed. The term "can" mean a container formed from sheet metal and consisting of a body and two ends or a body and a top. The term "can making" means the manufacturing process or processes used to manufacture a can from a basic metal.	The Can Making Pretreatment Categorical regulations are applicable to the regulated process wastewater generated from the Metal Container Corporation.

How long has the facility been in operation? **If the facility has been in operation prior to the date for existing sources (1/12/81 for Subpart A, B, C; 2/10/83 for Subpart D), do they meet the definition of a new source (see 403.3(m) and guidance)?**	
The facility has been operation since 1987 and is a new source to the Can Making Pretreatment Categorical Standards because it began after the new source date for this category, February 10, 1983. Therefore, the Pretreatment Standards for New Sources (PSNS) apply.	
Facility Operations/Observations	**Notes**
Do all regulated wastewaters from the processes flow through the monitoring point?	Yes
Do the monitoring location and self-monitoring sampling days appear to produce results that are representative of the discharge? **(403.12(g)(3))**	The monitoring location for the automatic sampler appears to be representative. The facility uses an ISCO automatic sampler and places the sampling hose in the discharge pipe from the clarifier. The sampler is programmed to collect a flow-proportioned sample over a period of 24 hours at 100 mL sample/100 flow pulses. The continuous pH monitoring meter is placed in the overflow weir to the discharge trough.
Is the monitoring location free from dilution? **(403.6(d) and 403.12(g))**	Dilution from non-regulated wastewaters: • Floor Cleaning Wastewater, less than 50 gallons per day. • Hand sinks in the process floor; less than 50 gallons per day. • Cooling tower blowdown wastewater. • Backwash wastewater from the DI Treatment System.

Sampling and Reporting	Notes
Where DMRs submitted on time in June and December of the previous calendar year? **(403.12(e))**	EPA evaluated the DMRs submitted on NetDMR for 2020 and all appear to be submitted within the deadline due date. However, the facility is currently reporting concentrations, as allowed by the CDPHE control mechanism. The control mechanism issued by the EPA will require the facility to report production-based values.
Were all parameters monitored? **(403.12(e))**	Yes
Does the DMR include measured average and maximum daily flows? **(403.12(e))**	Yes
Are appropriate sample types collected? • **Grab - pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds (some may be lab or field composited)** • **All other pollutants - 24-hour composite samples through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the EPA** **(403.12(g)(3))**	Yes
Do sample collection and analysis meet requirements in 40 CFR 136 (hold time, preservation, container type, method)? **(403.12(g)(5))**	Yes, with the following exceptions: • The facility currently uses nitric acid (HNO_3) as a preservative for phosphorus analysis. 40 CFR 136 requires phosphorus to be preserved using H_2SO_4 to a pH <2. The facility needs to ensure phosphorus is correctly preserved. • The laboratory analytical records indicate that fluoride is analyzed using EPA300.0/SW846 9056A methods. EPA 300.0 is approved analyses under the Clean Water Act, pursuant to 40 CFR 136. The SW846-9056A is not an approved Clean Water Act method. The facility needs to ensure the

Sampling and Reporting	Notes
	laboratory is using Clean Water Act approved methods listed in 40 CFR 136.
Were DMRs signed and certified by required personnel? **(403.12(l))**	Yes
Is the IU sampling at the required frequency (min 2/year)? **(403.12(e))**	Yes
If the IU is sampling more frequently than required, are the results included in the report? **(403.12(g)(6))**	NA
If the IU is sampling for cyanide only once per year, are both of the following conditions met? **(1) The first wastewater sample of each calendar year has been analyzed and found to contain less than 0.07 mg/l cyanide; and** **(2) The owner or operator of the coil coating facility certifies in writing to the Control Authority (EPA) that cyanide is not and will not be used in the coil coating process.** **(465.03(a))**	NA
Do sampling records contain: • **The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;** • **The dates analyses were performed;** • **Who performed the analyses;** • **The analytical techniques/methods use; and** • **The results of such analyses.** • **Record keeping requirements** **(403.12(o)(1))**	Yes
Are records kept for at least 3 years? **(403.12(o)(2))**	Yes
If IU sampling indicates a violation, was the EPA notified within 24 hours of the IU becoming aware of the violation? **(403.12(g)(2))**	NA
If IU sampling indicates a violation, did the IU repeat the sampling and analysis and submit the results of the repeat analysis to the EPA within 30 days after becoming aware of the violation? **(403.12(g)(2))**	NA

Sampling and Reporting

<table>
<tr><th></th><th>Notes</th></tr>
<tr><td>Was POTW notified immediately of all discharges that could cause problems to the POTW, including any slug loadings, as defined by §403.5(b)?
If no, were there such instances where the POTW should have been notified?
(403.12(f))</td><td>NA</td></tr>
<tr><td>Is the facility required to have a slug discharge control plan? If yes, it must contain to following:
Description of discharge practices, including non-routine batch Discharges.
Description of stored chemicals.
Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days; and
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.
(403.8(f)(2)(vi))</td><td>EPA evaluated the SDCP developed by the facility. The SDCP includes the following appendices:
Appendix A-2019 Tier II Reporting
Appendix B-Spill Containment and Control Plan
Appendix C-Emergency Action and Fire Prevention Plan
Appendix D-EPA Guidance Manual for Control of Slug Discharges
The current SDCP does not include identification and control measures that include worker training, equipment, containment structures, discharge practices, handling/transfer procedures, emergency response/spill containment to control the following non-routine or episodic discharges:
Discharge of chemical tanks in the can-washing lines (stages one, two, three, four and six)
Cleaning/maintenance of the Schneider Oil Filtration System
Wastewaters generated from other cleaning/maintenance of equipment/process lines
DI regeneration and backwash wastewaters
In addition, the SDCP needs to be updated to include worker training, standard operating procedures/criteria and measures to ensure spills are appropriately identified and profiled to ensure they are properly disposed off-site. The SDCP needs to also be updated to include the measures and worker training to ensure the dewatering of Oil Split tanks A+B, and the</td></tr>
</table>

Sampling and Reporting	Notes
	waste oil tank are performed appropriately and consistently.
Did the IU promptly notify the EPA and the POTW in advance of any substantial change in the volume or character of pollutants in their discharge? **(403.12(j))**	NA
Did the IU submit notification of hazardous waste discharge? If no, should they have? **(403.12(j) and (p))**	NA
Did the IU submit notification of bypass? If no, should they have? **(403.17)**	NA
Did the IU submit a complete baseline monitoring report (180 days before discharge) and a 90-day compliance report? **(403.12(b) and (d))**	NA
If the plant has decided to manufacture cans from an aluminum alloy containing less than 1.0% manganese, was the EPA Office of Water Regulations and Standards, Washington, DC 20460 notified? **Notification is required 30 days in advance and the chemical analysis of the alloy and the expected period of use.** **(465.03(d))**	NA

Significant Noncompliance Evaluation (403.8(f)(2)(viii))	Notes
If effluent violations have occurred, is the IU in significant non-compliance (SNC) for chronic or technical review criteria?	NA
Has the IU caused or contributed to pass through or interference? **If yes, evaluate for SNC.**	No
Has any discharge from the IU resulted in imminent endangerment to human health, welfare or to the environment? **If yes, evaluate for SNC.**	NA
Has the IU failed to meet a compliance milestone contained in an Order within 90 days? **If yes, evaluate for SNC.**	NA

Significant Noncompliance Evaluation (403.8(f)(2)(viii))	Notes
Has the IU failed to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules? **If yes, evaluate for SNC.**	NA
Has the IU failed to accurately report noncompliance? **If yes, evaluate for SNC.**	NA

Records Reviewed

- Slug Discharge Control Plan and Appendices
- 2020 DMRs-including production-based calculations
- 2020 flow and pH records
- 2020 Laboratory Data sheets
- 2020 Sludge Data
- 2020 Waste Manifests

Miscellaneous Information

NA

<table>
<tr><th colspan="3">Report Review and Signature</th></tr>
<tr><td>Drafter Name</td><td>Address/Phone Number</td><td>Date</td></tr>
<tr><td rowspan="2">Al Garcia</td><td>U.S. EPA Region 8
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<tr><td>303-312-6382</td></tr>
<tr><td>Reviewer Name</td><td>Address/Phone Number</td><td>Date</td></tr>
<tr><td rowspan="2">Kristin Ratajczak</td><td>U.S. EPA Region 8
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Date: 2021.03.25 15:36:10 -06'00'</td><td>U.S. EPA Region 8
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Summary of Findings

Metal Container Corporation

NPDES ID# COPF00102

March 3, 2021 through March 5, 2021

Pretreatment Inspection Findings	Follow up Action Items
1. The current SDCP does not include an identification and control measures that include worker training, containment structures or equipment, discharge practices, handling/transfer procedures, emergency response/spill containment to control the following non-routine or episodic discharges: • Discharge of chemical tanks in the can-washing lines (stages one, two, three, four and six) • Cleaning/maintenance of the Schneider Oil Filtration System • Wastewaters generated from other cleaning/maintenance of equipment/process lines • DI regeneration and backwash wastewaters • Proper identification and disposal/treatment of spills, • Dewatering of oil split tanks A, B and waste oil tank. 40 CFR 403.8(f)(2)(vi)(D) of the Pretreatment Regulations state that the SDCP shall contain, at a minimum, the following elements: (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.	**Pretreatment Requirement** 40 CFR 403.8(f)(2)(vi)(D) **Corrective Actions** Update the SDCP to include control measures that include worker training, containment structures or equipment, discharge practices, handling/transfer procedures, emergency response/spill containment to control non-routine, episodic batch discharges, spills, and the dewatering of oil split tanks A, B, and waste oil tank.
2. The facility currently uses HNO_3 as a preservative for phosphorus analysis. 40 CFR 136 requires phosphorus to be preserved using H_2SO_4 to a pH <2.	**Pretreatment Requirement** 40 CFR 136 **Corrective Actions**

	Ensure phosphorus is correctly preserved using H_2SO_4 to a pH <2.
3. The laboratory analytical records indicate that fluoride is analyzed using EPA 300.0/SW846 9056A methods. EPA 300.0 is approved analyses under the Clean Water Act, pursuant to 40 CFR 136. The SW846-9056A is not an approved Clean Water Act method. The facility needs to ensure the laboratory is using Clean Water Act approved methods listed in 40 CFR 136.	**Pretreatment Requirement** 40 CFR 136 **Corrective Actions** Ensure fluoride is analyzed using approved Clean Water Act methods found in 40 CFR 136.
4. The can counts numerated on the flow records are not equivalent to the production number of cans used to calculate compliance with the production-based standards found in 40 CFR 465, Subpart D. The control mechanism reissued by the EPA will require Metal Container to report compliance with the production-based standards. It is recommended Metal Container record accurate can production on the flow records. 40 CFR 403.12(g)(3) of the Pretreatment Regulations require that the compliance report must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period.	**Pretreatment Requirement** 40 CFR 403.12(g)(3) **Corrective Actions** Ensure current and appropriate data to calculate compliance with the production-based standards.
5. The facility did not produce pH calibration logs that document the calibration of the pH monitoring equipment. In addition, based on information received in the remote inspection, the facility is calibrating the pH meters with pH 4.0 and 7.0 buffers, though the expected pH of the final effluent is greater than 7.0. The facility needs to ensure the calibration of the pH meters brackets the expected pH of the wastewater. 40 CFR 403.12(g)(3) of the Pretreatment Regulations require that the compliance report must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period.	**Pretreatment Requirement** 40 CFR 403.12(g)(3) **Corrective Actions** Ensure the pH meters are calibrated with an upper pH of 10.0 in addition to a lower pH of 4.0 or 7.0, which effectively brackets the typical pH range of the wastewater discharged at the outfall.
6. Based on information provided by the facility during the inspection, the facility is only using a water rinse and is not adequately cleaning the	**Pretreatment Requirement** 40 CFR 403.12(g)(3)

composite sampler, associated hoses or composite bottles between sampling events used to generate reportable data. 40 CFR 403.12(g)(3) of the Pretreatment Regulations require that the compliance report must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period.	**Corrective Actions** Ensure the sampling equipment is adequately cleaned to ensure there is no cross-contamination of metals between sampling events. Good practices to minimize cross-contamination between sampling events is to clean the sampling equipment such as sampling probe, sampling hose, and sample container with an appropriate detergent, followed by rinses of acid solution and DI water.

Attachment 1 – Photo Log	
Photo #	Description
1	Bodymaker Lube day tank
2	Bulk tank farm, including secondary containment
3	Cupper Lube day tank
4	Caustic drum storage
5	Hydrochloric drum storage
6	Sulfuric Acid drum storage
7	Hydrofluoric Acid pumps and metering system
8	Ink storage racks