

REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

**AT
CELCO
124 Lawrence
Anthony, Kansas 67003**

KANSAS PRETREATMENT PERMIT: KSP000102

**BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

**Enforcement and Compliance Assurance Division
January 25, 2024**

INTRODUCTION

I conducted an Industrial User Compliance Inspection at Celco in Anthony Kansas, on January 25, 2024. The inspection was conducted under the authority of Section 308 of the Clean Water Act (as amended) and in accordance with EPA Region 7 Standard Operating Procedures. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

CELCO:

Steve Bellesine, President

Email: steve@celcoinc.com

Branson Deen, Supervisor

Brandon Bellesine, Vice-President of Compliance (phone only)

Email: brandon@celcoinc.com

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

Joe Heafner, Life Scientist

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FACILITY DESCRIPTION

CELCO performs electropolishing and passivation of metal parts for various clients. Parts are shipped to CELCO, cleaned, electropolished and or passivated, then rinsed. All process wastewater generated flows to the pre-treatment system before being discharged to the city of Anthony, Kansas. The pre-treatment system consists of pH neutralization, flocculation, and clarification before discharging. The facility also has an oxygen cleaning operation that does not use water in its processes.

This facility is subject to the Metal Finishing Standard for New Sources, 40 CFR Part 433, because of the electropolishing and passivation processes (Outfall 001).

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility mid-morning of January 25, 2024, and introduced myself. I presented my credentials to Mr. Steve Bellesine and explained the purpose and procedures of the inspection. I completed the Region 7 industrial user inspection checklist, conducted the physical inspection of the facility and the processes that generate wastewater, and then collected a sample of the wastewater discharge from Outfall 001.

SAMPLING PROCEDURES

On January 25, 2024, a grab sample was taken from Outfall 001. The effluent grab sample was collected into a clean container for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. The grab sample that was collected on January 25, 2024, was analyzed for metals, pH, and temperature values. The temperature and pH analysis were performed immediately on site.

All samples collected were packed in ice then hand delivered to the EPA Region 7 Laboratory. Chain-of-custody procedures were used for all samples. All appropriate Region 7 standard operating procedures in the collection, packaging, transportation, and handling of the samples were followed.

FINDINGS AND OBSERVATIONS

1. Permit: The Kansas Pretreatment Permit for CELCO became effective on April 1, 2020, and will expire March 31, 2025 (attachment 1). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, silver, zinc), total toxic organics (TTOs), and cyanide. The permit also places numerical limitations on those parameters. The permit further requires the facility to sample and analyze the parameters on a quarterly basis and submit discharge monitoring reports (DMRs) to the Kansas Department of Health and Environment (KDHE) on a semi-annual basis, by January 28 and July 28 of each year.

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last four reporting periods (July 2022, December 2022, July 2023, December 2023) which were provided electronically by the facility after the completion of the inspection. After my review, I placed the DMRs into the ECAD electronic file system. I found the facility in compliance for all four periods.

3. Water Balance: An accurate water balance was achieved during the inspection. The facility utilizes one source of water (city of Anthony) and has nine meters measuring the flow of water to the facility. The average water usage per month is approximately 40,000 gallons. Average monthly flows for Outfall 001 are approximately 20,000 gallons. The facility also has several Reverse Osmosis (RO) systems that use approximately 13,000 gallons. The RO systems are constantly recharging. RO reject water accounts for approximately 250 gallons per month, and the facility does have a lawn irrigation system that accounts for approximately 500 gallons. With 30 employees the average employee consumption is about 15 gallons per day (gpd). This is within the range of 5 to 25 gpd that is considered normal.

4. Total Toxic Organics: The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics provided it is following the provisions of its approved Solvent Management Plan (SMP). The SMP was readily available and a copy is included as attachment 2. A review of the SMP revealed that the facility has not updated the SMP since 2018. Mr. Brandon Bellesine stated that the SMP was in the process of being updated.

5. Sample Results: Analytical results from samples collected during the inspection are presented in Table 1. The complete data package for analytical results is included as attachment 3.

Sample Results For CELCO, mg/L																		
	Ag		Cd		Cr		Cu		CN		Ni		Pb		Zn		pH (s.u.)	
	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Min	Max
Outfall	0.43	0.24	0.11	0.07	2.77	1.71	3.38	2.07	1.2	0.65	3.98	2.38	0.69	0.43	2.61	1.48	5	10
001	ND		ND		0.431		4.24		Not Sampled		0.612		ND		0.05		9.24	
Result:	C		C		Cr		V		NA		C		C		C		C	

Sample results indicate that the facility violated the daily maximum limit for Copper on the day of the inspection.

JOSEPH HEAFNER
 Digitally signed by JOSEPH HEAFNER
 Date: 2024.02.27 13:50:59 -06'00'
 Joe Heafner
 Life Scientist

JODI BRUNO
 Digitally signed by JODI BRUNO
 Date: 2024.02.27 14:44:25 -06'00'
 Jodi Bruno
 Branch Chief

Attachments:

1. Pretreatment Permit (16 pages)
2. Spill and Solvent Management Plans (4 pages)
3. Data Transmittal for Project JAH2410 (12 pages)
4. EPA Industrial User Inspection Checklist (6 pages)