REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

AT
Albers Finishing and Solutions
38628 W. 15th South
Cheney, Kansas 67025

KANSAS PRETREATMENT PERMIT: KSP000110

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7

Enforcement and Compliance Assurance Division
February 26-27, 2024

INTRODUCTION

I conducted an Industrial User Compliance Inspection at Albers Finishing and Solutions in Cheney Kansas, from February 26-27, 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

Albers Finishing and Solutions (Albers Finishing):
Bret Albers, Co-Owner
Email: balbers@albersfinishing.com

U.S. Environmental Protection Agency (EPA), Region 7:
Joe Heafner, Life Scientist
Email: heafner.joseph@epa.gov

FACILITY DESCRIPTION

Albers Finishing has three different production lines at the facility. The first line performs zinc plating with a chromate finish of various metal parts for clients. The second line anodizes aluminum parts for the aerospace industry that is currently not in operation. The third line utilizes an acid wash to prepare parts for a liquid paint process. Parts are shipped to Albers Finishing then, depending on the process used, can be plated, anodized, or painted. All process wastewater generated from the plating and anodizing line flows to the pre-treatment system before being discharged to the City of Cheney, Kansas. The pre-treatment system consists of pH neutralization, flocculation, and clarification before discharging and is designated as Outfall 002. Process wastewater from the acid wash and paint line flows into a pH neutralization tank where the water is neutralized with Sodium Hydroxide before being discharged the City of Cheney, Kansas, through Outfall 001.

This facility is classified as subject to the Metal Finishing Standard for New Sources, 40 CFR Part 433, because of the metal plating and anodizing processes (Outfall 001).

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility during the afternoon of Monday, February 26, 2024, and introduced myself. I presented my credentials to Mr. Bret Albers and explained the purpose and procedures of the inspection. I completed the Region 7 inspection checklist (attachment 1), conducted the physical inspection of the facility and the processes that generate wastewater. Since the wastewater treatment system was not in operation on Monday, I explained that I would be back during the morning of Tuesday, February 27, 2024 to pull samples of the wastewater discharges from Outfalls 001 and 002. I completed the inspection during the morning of Tuesday, February 27, 2024.

SAMPLING PROCEDURES

On February 27, 2024, grab samples were taken from Outfalls 001 and 002. The effluent grab samples were collected into clean containers for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. The grab samples that were collected on February 27, 2024, were 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 Albers Finishing became effective on April 1, 2023, and will expire March 31, 2028 (attachment 2). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, sliver, 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 five reporting periods (January 2022, July 2022, January 2023, July 2023 and January 2024) which was provided by the facility after the completion of the inspection. After my review, I placed the DMRs into the ECAD electronic file for the facility. During the review, I noted that the facility violated the limits for Zinc at Outfall 001 in July 2023. Mr. Albers stated during the inspection that during the summer of 2023, they were having trouble with their automatic pH adjustments, but have since solved the issue. I noted that there were no violations of the effluent limits after July 2023 to the present.

3. Water Balance: An accurate water balance was achieved during the inspection. The facility utilizes one source of water (City of Cheney) and has two meters measuring the flow of water to the facility. The average water usage per month is approximately 500,000 gallons. Average monthly

flows for Outfall 002 are approximately 430,000 gallons while the monthly discharge from Outfall 001 is approximately 55,000. The majority of remaining water usage is from the Reverse Osmosis systems and sanitary sewer discharges from the facility. The RO system utilizes approximately 11,000 gallons per month while the sanitary waste from the facility accounts for approximately 4,000 gallons per month.

4. Total Toxic Organics: The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics (TTOs) provided it is following the provisions of its approved Solvent Management Plan (SMP). The SMP was provided after the completion of the inspection and a copy is included as attachment 3. A review of the SMP revealed that the facility has small amounts of Methyl Ethyl Ketone, Methyl Amine Ketone, and Acetone used in the paint prep and cleanup areas. These solvents are stored in the paint storage area of the facility. I noted that the SMP was last certified by the facility in 2016. After the review, I placed the copy of the SMP in the ECAD electronic file for the facility.

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 4. Sample results indicate compliance with parameters set in the permit.

Sample Results For Albers Finishing, 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	0.0615		ND		ND		0.0123		Not Sampled		ND		ND		0.108		6.5	
Result:	C		C		C		C		NA		C		C		C		C	
002	ND		ND		0.0252		0.02		Not Sampled		ND		ND		0.447		9.43	
Result:	C		C		C		C		NA		C		C		C		C	

Results of the sampling indicate that the facility did not violate the effluent limits established by the permit for sampling that was conducted during the inspection.

JOSEPH HEAFNER
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Date: 2024.03.25 06:53:44 -05'00'

Joe Heafner
Life Scientist

JODI BRUNO
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Jodi Bruno
Branch Chief

Attachments:
1. EPA Industrial User Inspection Checklist (6 pages)
2. Pretreatment Permit (17 pages)
3. Solvent Management Plan (4 pages)
4. Data Transmittal for Project JAH2411 (13 pages)