REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

AT
A-1 SCAFFOLD MFG. INC.
590 COMMERCE PARKWAY, HAYS, KS 67601

PERMIT: KSP000106

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 7

Enforcement, Compliance, and Assurance Division March 25, 2024

INTRODUCTION

At the request of the Enforcement Compliance and Assurance Division, I conducted an Industrial User Compliance Sampling Inspection at the A-1 Scaffold Manufacturing, Inc. (A-1) facility in Hays, Kansas, on March 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

A-1 Scaffold Manufacturing, Inc.:

Brian Dube, Environmental Contact, 785-621-5121, brian@a1scaffoldmfg.com
Jamey Bott, jamey@a1scaffoldmfg.com

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

Brian D'Alfonso, Biologist, 913-551-5095, dalfonso.brian@epa.gov

FACILITY DESCRIPTION

A-1 manufactures steel and aluminum scaffold and planking, primarily for the construction industry. The facility began operation as A-1 Scaffold Manufacturing in February 2010. According to the EPA Envirofacts database, this facility has the North American Industry Classification System (NAICS) code 332323. A-1 has approximately 60 employees and operates a single, 8-hour shift, primarily weekdays with the occasional Saturday shift.

Principal activities are cutting, bending, and welding or bolting steel and aluminum scaffold and planking components. Some decking components have wood sheeting included as well. The sole source of wastewater generation is the powder coating process. In the powder coating process, steel components are hung on a rack and suspended in an enclosed spray booth. The components are sprayed with a degreaser, then coated with a phosphate spray coating. After the phosphate is applied, the components are rinsed with water and rolled into a drying booth. After the parts are

dry, they are placed in a curing oven to set the phosphate coating on the metal. Metal forming is limited to pressing, cutting, and welding steel components. No casting or metal extrusion is conducted on-site. The only process wastewater is generated during parts washing before and after application of the phosphate coating. A-1 performs no pretreatment of the wastewater generated.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced at approximately 1:30 pm on March 25, 2024. I introduced myself, presented my credentials to Mr. Dube, and I explained the purpose and procedures of the inspection. I conducted the physical inspection of the facility that afternoon, focusing on inspecting the wastewater generation, collection, treatment, and discharge processes. I completed the inspection by filling in an Industrial User Inspection Checklist which is included as Attachment 1. Photos were taken during the inspection (attachment 2) I completed the inspection that afternoon by collecting samples, then conducting an exit briefing with Mr. Dube and Mr. Bott.

SAMPLING PROCEDURES

On March 25, 2024, I collected grab samples of the wastewater effluent for permit parameters. Samples were collected from a floor drain below the phosphate coating process which serves as outfall 001 (Photo 2) while wastewater was being discharged. The sample was collected using a clean glass jar dipped into the floor drain trough and collected from the full depth of wastewater in the trough. The wastewater in the jar was then transferred into one 1-liter plastic sample container for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. In addition, a grab sample was analyzed for temperature and pH immediately on site.

All samples collected were transported 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

Permit: A Kansas Pretreatment Permit was issued to A-1 in January of 2022 and will expire December 31, 2026 (Attachment 3). The permit requires the facility to monitor its effluent for flow, pH, cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), nickel (Ni), silver (Ag), zinc (Zn), cyanide, and total toxic organics (TTOs). 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 Kansas Department of Health & Environment (KDHE) on a semi-annual basis (January 28 and July 28 of each year).

The facility was last inspected by KDHE on May 14, 2019 (Attachment 4). The facility was found to be in "compliance" but had five "conclusions/recommendations":

- permit modification for sampling procedures,
- sampling documentation for pH,
- air compressor discharge management,

- the solvent management plan needed to be updated, and
- sample collection recommendation.

Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last six reporting periods (January 2021 through December 2023) which was provided by facility personnel after the inspection. I found that the facility was in compliance for each of those periods. In addition, I examined this data and found that all discharge limits and monitoring requirements were met.

Water Balance: An accurate water balance was achieved as part of the inspection. The facility utilizes one source of water (city of Hays). The facility purchased an average of approximately 22,000 gallons of water each month through the last six months of 2023. This is according to the facility's water purchase spreadsheet (attachment 5). The facility reported that it had discharged approximately 3,656 gallons per month (on average) through outfall 001. Facility personnel stated that the only water used at the facility is for sanitary purposes and in the wash bay. This averages out to approximately 15 gallons per day per employee for sanitary purposes. This is within the range of 5 to 25 gpd which is considered normal domestic usage.

Solvent Management Plan (SMP): I reviewed a copy of the facility's SMP (attachment 6), and it appeared to be adequate. Facility personnel were not sure if the list of organic compounds attached to the SMP were current. I noted this as item #2 on the Notice of Preliminary Findings (NOPF) that was left on-site after the inspection.

EPA Sample Results: Analytical results of the effluent samples collected during this inspection are provided below and are included as Attachment 7. I reviewed the effluent sample data in the table below and found that the effluent met permit limits.

Table 1. Analytical Results for Effluent Samples Collected During Inspection

Parameter	Outfall 001	Outfall 001 Limits
Cd (mg/L)	ND	0.11
Cr (mg/L)	0.035	2.77
Cu (mg/L)	0.173	3.38
Pb (mg/L)	0.044	0.69
Ni (mg/L)	0.020	3.98
Ag (mg/L)	ND	0.43
Zn (mg/L)	1.280	2.61
pH (S.U.)	7.45	5.0-10.0
Flow (MGD)	0.001	NA

- Permit limits are daily maximums. Permit limits for pH are minimum followed by maximum.
- "ND" denotes a non-detect result

Stormwater: While at the facility, I discussed the facility's stormwater coverage requirements with facility personnel. Facility personnel were not sure if they were required to have stormwater coverage or if they had a Stormwater Pollution Prevention Plan. I explained that I was not inspecting stormwater requirements during this inspection, but facility personnel should contact KDHE personnel to discuss requirements to ensure they are in compliance. This was noted as item #1 on the NOPF that was left on-site.

Summary: During the exit meeting on March 25, 2024, I went over the facility's rights to claim confidential business information. The facility did not make any claims of confidentiality (attachment 8). During the exit briefing I issued a NOPF for the following (attachment 9):

1) Contact KDHE to determine status of stormwater coverage requirements.

2) Update solvent management plan (as needed).

BRIAN D'ALFONSO
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Brian D'Alfonso
Biologist

NICOLE MORAN
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Nicole Moran
Section Supervisor, ECAD/WB/DWIS

Attachments:
1. EPA Industrial User Inspection Checklist (6 pages)
2. Photo Log (4 pages)
3. A-1 Scaffold Pretreatment Permit KSP000106 (15 pages)
4. KDHE Special Waste Approvals (4 pages)
5. Facility Water Usage (1 page)
6. A-1 Solvent Management Plan (3 pages)
7. Data Transmittal Packet for Activity BPD2406 (14 pages)
8. Confidential Business Information Form (4 pages)
9. March 25, 2024, NOPF (1 page)