

Pretreatment Compliance Inspection: Milwaukee Metropolitan Sewerage District, Milwaukee, Wisconsin

Control Authority Name and Address

Milwaukee Metropolitan Sewerage District
260 West Seeboth Street
Milwaukee, Wisconsin 53204

Responsible Official

Kevin Shafer, Executive Director

Inspection Participants

Milwaukee Metropolitan Sewerage District

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SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency (EPA) conducted a Federal Pretreatment Compliance Inspection (PCI) of the Milwaukee Metropolitan Sewerage District (MMSD, Milwaukee MSD, or POTW) from July 8 to 11, 2024. The purpose of the inspection was to evaluate the procedures and implementation of MMSD's pretreatment program. MMSD has a Wisconsin Pollutant Discharge Elimination System (WPDES) Permit—Permit No. WI0036820 (Permit WI0036820). Part 9.5 of Permit WI0036820 states that MMSD shall implement an industrial pretreatment program and any subsequent modifications approved by the Wisconsin Department of Natural Resources (WDNR). EPA's inspection consisted of:

1. Review of requested submittals prior to on-site inspection;
2. Interviews and discussion with Milwaukee staff;
3. Industrial User (IU) file reviews; and
4. Site visits at three IUs: Sonoco Metal Packaging, Hayes Performance Systems, and Greif - Wisconsin Paperboard.

On July 8, 2024, at 10:30 a.m., C.D.T., inspectors Newton Ellens, Jennifer Bush, and Eric Small (EPA staff) arrived at the Milwaukee MSD, located at 260 West Seeboth Street, Milwaukee, Wisconsin. There, they met WDNR and MMSD staff. MMSD staff escorted WDNR and EPA staff to a conference room. EPA inspectors presented their credentials and began the inspection.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

MMSD has two wastewater treatment plants: the Jones Island Water Reclamation Facility (WRF) and the South Shore WRF. The collection system and treatment plants are interconnected. The two WRFs have a design flow rate of 630 million gallons per day (MGD), and an actual flow rate of 177 MGD. The treatment processes at the two WRFs are as follows:

1. Primary—screening and settling; and
2. Secondary—activated sludge, chemical phosphorous removal (for the South Shore WRF only).

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

MMSD staff stated the following during an initial interview:

A. Pretreatment Program Modification:

MMSD originally issued its sewer use ordinance in the 1980's. MMSD amended its ordinance on August 18, 1983, and January 22, 2018.

B. Industrial User (IU) Characterization:

- MMSD's definition of a significant industrial user (SIU) is similar to the definition written in 40 C.F.R. § 403.3(v).
- Per 40 C.F.R. § 403.3(v)(3), MMSD may determine that an industrial user is not a SIU, if the IU:

- Discharges an average of 25,000 gallons per day (gpd) or more of process wastewater to the sewer; or
- Discharges process wastewater that is 5% or more of the average dry weather hydraulic or organic capacity of the sewerage system; but
- MMSD determines that the industrial user has no reasonable potential to adversely affect the sewerage system.
- Per the regulation written above, MMSD has classified 16 IUs as non-significant, although each IU has a discharge that exceeds 25,000 gpd.
- MMSD conducts the following activities to identify SIUs:
 - All new dischargers of process wastewater must submit a notice of intent to discharge. MMSD evaluates each notice.
 - MMSD collects samples at industrial parks. MMSD samples each industrial park for three days each year. If samples identify significant pollutant concentrations, MMSD will take additional samples upstream and/or conduct inspections.
 - Local public works staff, building inspectors, and plumbing inspectors report facilities that may be significant to MMSD. MMSD will follow up on these leads through telephone calls, inspections, and/or sampling.
 - MMSD reviews business directories, sewer user charge records, and newspaper articles.
 - Twenty municipalities are part of MMSD. MMSD requests lists of new industries from each community.
 - MMSD's engineering and planning department may identify new industries.
 - MMSD monitoring staff takes note of new industries in the field.
 - Subject industrial users tell MMSD about new industries in the field.
 - MMSD reviews the Milwaukee Business Journal.
 - New industrial users are identified at MMSD staff meetings.
 - MMSD reviews occupancy permit applications.
 - Prospective industrial users must submit plans to install pretreatment equipment to WDNR. WDNR informs MMSD about these plans. MMSD will issue permits to industrial users pending WDNR's plan review.
- MMSD has not issued IU permits to breweries. MMSD staff stated that pollutants discharged by breweries (biochemical oxygen demand (BOD), total suspended solids (TSS), and oil and grease) are not substantially harmful to the POTW.¹ MMSD collects BOD, TSS, and flow data to surcharge breweries. MMSD also tests the pH of breweries.
- MMSD requires IUs to report each substantial change in discharge. MMSD defines a "substantial change in discharge" as a 20% change in the IU's production rate. MMSD also identifies substantial changes in discharge through sampling and inspections.
- Milorganite
 - Milorganite is MMSD's long-standing biosolids product.
 - It meets the EPA Class A Exceptional Quality (EQ) standard for biosolids.
 - In 2008, municipalities in MMSD's sewer shed re-lined their sewer pipes.

¹ MMSD stated that Molson Coors is the brewery with the largest organic discharge. EPA staff asked (1) what is MMSD's organic capacity, and (2) what is Molson Coors' organic discharge to MMSD.

- During the sewer re-lining project, workers released polychlorinated biphenyls (PCBs) from Milwaukee Die Cast, an abandoned superfund site.
- MMSD discovered the PCB contamination during testing.
- After the discovery of PCB contamination, MMSD temporarily stopped selling Milorganite to the public.
- MMSD conducted PCB testing at sites where Milorganite was applied.
- MMSD found PCB contamination at two locations at Wick Field. MMSD subsequently conducted remediation at this site.
- Since then, MMSD has sampled for PCBs in the solids daily.
- Perfluoroalkyl and Polyfluoroalkyl Substances
 - MMSD conducts testing of their solids for perfluoroalkyl and polyfluoroalkyl (PFAS) substances.
 - MMSD samples its effluent for PFAS about two or three times annually.
 - Sample analysis shows that MMSD's effluent has less than five parts per billion (ppb) per PFAS analyte.
 - Per WDNR, wastewater treatment plants receive a warning if their solids have a PFOA and PFOS sum of 20 ppb or more. Wastewater treatment plants must take action if the sum of the PFOA and PFOS concentration in their solids is greater than 50 ppb.

C. Hauled Waste:

- Groundwater remediation waste
 - Water from groundwater remediation sites may be contaminated. MMSD accepts this water for treatment.
 - MMSD does not issue permits to groundwater remediation sites, but it grants temporary approvals to accept such water.
 - MMSD's limits on contaminated groundwater depend upon the circumstances, such as the volume of the discharge, the duration of the discharge, the pollutants present, and the pollutant concentration.
 - MMSD's limits on groundwater remediation wastewater include local limits, technology-based limits (such as a 5 mg/L limit on total detectable organic compounds), and a 100 mg/L TSS limit.
 - MMSD may regulate sites with long-term groundwater remediation projects as SIUs. MMSD may implement informal discharge conditions for sites with short-term remediation projects.
 - MMSD implements various sampling requirements for groundwater remediation sites.
 - MMSD reserves the right to refuse groundwater remediation wastewater if it exceeds concentration thresholds.
- High-strength waste
 - MMSD accepts hauled loads of high-strength waste.
 - MMSD has high-strength wastes added to anaerobic digesters at its South Shore WRF—it is used to increase the amount of methane gas used to generate electricity.
 - MMSD's high-strength waste program is separate from its pretreatment program.
 - MMSD has three suppliers of high-strength waste:
 - General Mitchell Airport (de-icing fluid that contains glycol);

- Spent yeast from breweries; and
 - Grind to Energy (Insinkerator)—a garbage disposal for groceries.
- Domestic waste
 - MMSD has not accepted hauled domestic wastewater for 20 years.

D. Application of Pretreatment Standards and Requirements

- MMSD set local limits for arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, cyanide, and hexane extractable materials.

E. Compliance Monitoring:

- MMSD requires each SIU to sample its discharge up to three times a year.
- MMSD designated certain categorical IUs (CIUs) as “mid-tier CIUs.” Mid-tier CIUs are subject to reduced reporting and inspection frequency requirements.
- MMSD requires mid-tier CIUs to sample its discharge annually, per 40 C.F.R. § 403.12(e)(3).
 - MMSD did not inspect 23 SIUs in 2023, per 40 C.F.R. § 403.8(f)(2)(v)(C).
- MMSD samples each SIU’s discharge up to twelve times a year.
- MMSD increases an SIU sample frequency if the SIU violates pretreatment standards or requirements:
 - MMSD may increase a SIU’s self-monitoring frequency to once every 30 days.
 - MMSD may increase its own SIU sampling frequency to once a day.
- In 2023, MMSD did not sample or inspect two SIUs, because each SIU temporarily halted production and discharge of its process wastewater.
- MMSD requires each IU to submit its self-monitoring report before the end of the month following the month in which the sample was collected.
- When an IU’s self-monitoring identifies a violation, then MMSD requires the IU to submit its self-monitoring report within five days of receiving the result.
- MMSD inspects SIUs annually. Additional inspections may occur in response to process modifications, violations, staff changes, or other factors.
- MMSD collects all IU samples for analysis. MMSD conducts sample analysis for metals. Contract laboratories pick up samples from MMSD’s Central Laboratory to conduct analysis for certain pollutant parameters:
 - Eurofins Analytical Testing conducts sample analysis for cyanide.
 - Pace Analytical Services conducts sample analysis for mercury and organics.
- Slug control plans:
 - MMSD evaluates whether each SIU should have a slug control plan, as part of its inspection.
 - MMSD has required less than ten SIUs to have slug control plans:
 - Generally, SIUs’ internal best management practices are sufficient to manage slug discharges.
 - MMSD strongly encourages SIUs to have secondary containment.
 - MMSD reviews spill management protocols when conducting IU inspections.
 - Because of MMSD’s large flow rate, “slugs” from SIUs would have a minor effect on the POTW.
- Signatory requirements for IUs

- Instead of requiring IUs to submit a signed certification with each self-monitoring report, MMSD requires each IU to submit an initial “wet ink” signature, then submit scans of signed certifications in subsequent self-monitoring reports. MMSD staff would then compare each scanned signature with the “wet ink” signature on file.

F. Enforcement:

The violation criteria that meet MMSD’s definition of significant noncompliance criteria are similar to the criteria listed in 40 C.F.R. § 403.8(f)(2)(viii). One exception is the criteria under 40 C.F.R. § 403.8(f)(2)(viii)(H):

Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

Instead of using the criteria written above, MMSD uses the following violation criteria:

Failure to Collect or Analyze Samples: Failure to collect samples according to the requirements established by an applicable wastewater discharge permit or to analyze samples using a method set forth in 40 C.F.R. Part 136 or Ch. NR 219, Wis. Adm. Code, or a method specifically required by an applicable categorical pretreatment standard.

Despite this discrepancy, MMSD stated that it could determine other types of violations to be in significant noncompliance.

MMSD uses informal compliance schedules to address certain types of IU noncompliance. However, informal compliance schedules are not part of MMSD’s Enforcement Response Plan (ERP).

Notice of high/low result:

- MMSD may issue a “notice of high/low result” (NHLR) to an unpermitted entity, if sample analysis results show that the entity’s discharge is concerning.
- MMSD may issue an IU permit to an entity with repeated NHLRs.
- MMSD may issue a “notice of high/low result” to permitted entities if a sample is collected at a different location than the permitted discharge location (i.e. downstream of the discharge location).

G. Other

Seven percent of MMSD’s sewer system is combined. MMSD requires an IU (WE Energy Power Plant) to stop discharging wastewater to the sewer during combined sewer overflows (CSOs). This requirement, however, is to satisfy groundwater-related requirements, not the requirements under the “nine minimum controls” provision in MMSD’s WPDES permit. There are other IUs that discharge to MMSD’s combined sewers, but MMSD does not require those IUs to stop discharging during CSOs.

SECTION 4.0: FILE REVIEWS

4.1 IU Identification

IU Permit Number	IU Name	IU Type	Avg total flow (gpd)	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
4585.10	Sonoco Metal Packaging	CIU	77,102	70,000	Yes	Jennifer Bush	40 C.F.R. 465 COIL COATING POINT SOURCE CATEGORY
1174.10	ATI Ladish Forging	CIU		700,000	No	Newton Ellens	40 C.F.R. 467 ALUMINUM FORMING POINT SOURCE CATEGORY, and 40 C.F.R. 471 NONFERROUS METALS FORMING AND METAL POWDERS POINT SOURCE CATEGORY
6334.01	ETE Reman	Non-Categorical SIU		5,000-6,000	No	Eric Small	N/A
5482.08	Seidel Tanning Corporation	CIU	30,375		No	Jennifer Bush	40 C.F.R. 425 LEATHER TANNING AND FINISHING POINT SOURCE CATEGORY

4584.06	General Mills Operations, Inc.	Non-Categorical SIU		20,000	No	Newton Ellens	N/A
2141.08	Hayes Performance Systems	CIU	2,202		Yes	Jennifer Bush	40 C.F.R. 433 METAL FINISHING POINT SOURCE CATEGORY
5048.09	Greif - Wisconsin Paperboard	CIU		120,000	Yes	Eric Small	40 C.F.R. 430 THE PULP, PAPER, AND PAPERBOARD POINT SOURCE CATEGORY

4.2 Facility Information

Sonoco Metal Packaging
8500 W. Tower Ave.
Milwaukee, Wisconsin 53224-2894

Sonoco Metal Packaging (Sonoco) is a steel food can and aerosol can producer. There are two steel can washing lines, which include alkaline washing to clean the cans to prepare them for beading. There is also a stamping and lubricating process onsite, which sprays the lubricant between the metal and dies. The reverse osmosis (RO) unit used for de-ionization resin regeneration includes washing with sulfuric acid and sodium hydroxide solutions. The discharge flows to the onsite wastewater treatment. The final products are cans used for foods. The facility discharges continuously to MMSD, except for the de-ionization process, which batch discharges 6,000 gallons every two weeks to the outfall. There are two outfalls onsite (Outfall 1.1 is after the pretreatment process, but before mixing with domestic waste. Outfall 1.0 is the final discharge to the POTW and is located outside).

ATI Ladish Forging
5481 South Packard Avenue
Cudahy, Wisconsin 53110

ATI Ladish Forging (ATI Ladish) hammers and presses aluminum, steel, nickel-cobalt, and titanium, and operates some of the largest forges in the world. Contact cooling, part and equipment cleaning, and heat treatment quenching produce process wastewater.

ETE Reman
8700 N. Servite Drive
Milwaukee, Wisconsin 53223

ETE Reman entails three production processes that generate wastewater, including the following: (1) initial cleaning, (2) transmission pressure washing, and (3) transmission tote cleaning. The first process, initial cleaning, is where transmissions are cleaned via draining fluids and sucking out as much transmission oil as possible. From this point, fluids are transferred to totes and hauled away. This is either a batch or continuous process. Next, transmission pressure washing is conducted at the facility, where dirty/oily transmissions are conveyed through large washers/dryers and then are manually pressure washed. This is a continuous process that is followed by a forced air dry. The third and final process described for the facility entails transmission tote cleaning, where dirty totes that transmissions were received in are sent through washers and cleaned. Outfall 1.1 discharges continuous wastewater from transmission tote cleaning and transmission pressure washing. Pretreatment consists of an oil/water separator and belt/disk/rope oil skimmer, which was deemed to be in fair condition at the time of the inspection. Domestic/sanitary waste is also discharged to the facility.

Seidel Tanning Corporation
1306 E. Meinecke Ave.
Milwaukee, Wisconsin 53212

Seidel Tanning Corporation (Seidel) is a leather tannery that conducts re-tanning, coloring, and finishing of top-grain cow-hides. The facility has ten (10) different processes onsite, including re-tanning, sample tanning, set out (re-wets the leather and then rolls out the water), wringing, paste line panel washing, hide-washer, spray line nozzle cleaning, spray line over spray waterfall air scrubber, roll coating machine cleaning, and hide wetting and conditioning. The pretreatment process includes mixing, equalization, and lime addition, which is followed by a screening with a lime, folic acid or aluminum chloride addition. The third step is polymer addition with induced air flotation skimming and ends with a screw press for filtering sludge out prior to discharging. There are a total of 6 outfalls onsite. Outfall 1.1 is the sampling point and is located inside the facility between the flotation unit and the wall, on the side of the equalization tank. This outfall is just process wastewater. Outfall 1.1 discharge to Outfall 1.0, which is located outside and is connected to the sewer line. Outfall 2.0 and 3.0 only contain domestic waste. Outfall 4.0 only contains loading dock floor drain wastewater. Outfall 5.0 only contains storm water. There are both batch and continuous discharges onsite.

General Mills Operations, Inc.
4625 South 6th Street
Milwaukee, Wisconsin 53221

General Mills Operations, Inc. (General Mills) is a snack food manufacturer. Wastewater is generated by cleaning snack lines and fryers, boiler blowdown, and sanitary. Pretreatment consists of a holding tank, pH adjustment, chemical precipitation and clarification, and dissolved air flotation. The IU has a single outfall (Outfall 1.0). General Mills discharges wastewater in batches.

Hayes Performance Systems
5800 W. Donges Bay Rd
Mequon, Wisconsin 53092

Hayes Performance Systems (Hayes) is a metal finisher which conducts zinc phosphating and hard coat anodizing. There is also a parts washer, pressure washer, vibratory deburring, and machine cooling process onsite. The pretreatment process includes pH raising, calcium chloride addition, polymer and coagulant addition, and clarification prior to discharge. The final products at Hayes include brakes for bicycles, power sport equipment, heavy equipment, specialty products, etc. There is one outfall to the sewer (Outfall 1.0) and the facility discharges batch and continuously in different locations of their process.

Greif - Wisconsin Paperboard
1514 East Thomas Avenue
Milwaukee, Wisconsin 53211

Per the 2023 inspection report, the production process for Greif – Wisconsin Paperboard (Wisconsin Paperboard) is 24 hours/day and 7 days/week, with a scheduled shutdown from May 15-25th, 2023. The process is indicated as being continuous. The facility has six outfalls to the sewer system and one process-related outfall. These are identified in the permit as Outfall 3.0 (containing only process water from Outfall 3.1), 5.0, 8.0, 12.0, 13.0, and 14.0. The process entails two papermaking machines, with the process diagram identifying a waste stream of pulping, a cyclone to remove dense solids, screening, pressing against felt belt, rolling around heated rollers, and the rare application of sizing, waxing, or other surface treatments. Waste paper is obtained from one of three sources: (1) pre-consumer, from paper converting facilities, (2) post-consumer, from commercial and industrial sources, and (3) post-consumer, from residential recycling programs. Approximately 475 to 525 tons of waste paper per day are utilized. It is noted as a flow rate of continuous discharge, with cycling on and off to balance flow in the mill. Flow fluctuates between 25 and 442 GPM. Several different operations produce wastewater. Two large sumps collect this wastewater. From the two sumps, wastewater flows to a tank ("Krofta Feed Tank" or "recycle tank"). This tank feeds the dissolved air floatation system ("Krofta"), which returns treated wastewater to the Krofta Feed Tank. Pulping reuses water from this tank. When the demand for water is less than the supply, the tank overflows to the sewer. Another process employed at Wisconsin Paperboard is that when wastewater flow is very high, but demand is very low, Wisconsin Paperboard has a filtration system for overflow from the recycle tank. An example of when this condition might occur is when Wisconsin Paperboard makes black paperboard. When this product is finished, much cleaning is necessary to prevent the black coloring from affecting subsequent products. DAF sludge is reintroduced into papermaking. Overall, components of the pretreatment system include the following: dissolved air flotation, flow equalization, continuous flow, and reverse osmosis.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

Statement of Non-transferability

MMSD's IU permits do not require each IU to (1) give the District prior notification of a permit transfer, and (2) provide a copy of the existing permit to the new owner or operator.

Applicable effluent limits

ATI Ladish - The lead limit in the IU permit (6.0 mg/L) does not match the lead local limit in the Sewer Use Ordinance (SUO) (2.0 mg/L).

Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)

The IU permits for Sonoco, ATI Ladish, Seidel, and Hayes do not include a description of the required process for seeking a waiver for a categorical pollutant not present nor expected to be present.

Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to be present?

Sonoco and Hayes – The IU permit does not require sampling for fluorine, manganese, and TTOs (categorical limits). The IU file, however, does not include documentation showing that the POTW has waived monitoring requirements for these pollutants.

Sample types (grab or composite)

Sonoco - The flow proportional composite sample requirements do not include a required duration for flow-proportional samples.

Hayes - The permit requires flow proportional composite samples over the period of a discharge, up to a maximum of 24 hours, instead of a 24-hour flow proportional composite. The IU file does not include documentation of the decision to allow alternative sampling.

Reporting requirements (including all monitoring results)

ATI Ladish - Part 3.01 2) a) of the IU permit requires flow reporting for only one of the five outfalls (Outfall 7.0). It does not require flow reporting for Outfalls 9.1, 19.0, 21.0, and 21.1.

Notification of spills, bypasses, upsets, etc.

Sonoco, Seidel, and Hayes – The upset notification requirements do not state the permittee is required to report when the upset is expected to end if the event is still ongoing.

ATI Ladish, ETE Reman, General Mills, and Wisconsin Paperboard – The bypass notification requirements in each IU permit do not require the IU to report steps taken to reduce and eliminate bypasses.

Notification of significant change in discharge

For Sonoco, ATI Ladish, ETE Reman, Seidel, General Mills Operations, Hayes, and Wisconsin Paperboard: The notification of significant discharge requirement in each IU permit does not require the IU to notify the MMSD in advance of a substantial change in the volume or character of the discharge.

Requirements to control slug discharges; determined by the POTW to be necessary

Sonoco – According to an MMSD inspection report, Sonoco has a slug discharge control plan. However, the IU permit does not include a requirement to control slug discharges.

B. Application of IU Pretreatment Standards:

Calculation and application of categorical standards

ATI Ladish - The production-based standards calculations (for Outfall 7.0) include a multiplier for categorical limits. At the time of the review, the MMSD staff did not know where this multiplier comes from. Also, the calculation includes a "Ferrous Allowances" spreadsheet for Outfall 7. The spreadsheet states, "Categorical Pretreatment Standards are from Table VII-21 - Summary of Treatment Effectiveness (p.1414) and Table VII-22 - Summary of Treatment Effectiveness for Selected Non-conventional Metal Pollutants (p.1415) from Development Document for Effluent Limitations Guidelines and Standards for the Nonferrous Metals Forming and Metal Powders Point Source Category." The IU hammers and presses steel, but there are no limits for forging from Part 420 (Iron and Steel).

Classification as new/existing source

Sonoco - The Permit classifies Sonoco as a new source; however, the inspection report lists part of the process as an existing source.

ATI Ladish - The IU permit includes pretreatment standards for existing sources. The IU file does not include information showing when the facility was constructed.

Calculation and application of production-based standards

Sonoco - MMSD does not document the calculations of the production-based standards. MMSD rounds the grams/day calculations to the nearest whole number (sometimes higher, sometimes lower than actual calculated grams per day). For example, chromium grams per day calculation is 125.91 grams, but the permit limit is 130 grams/day. For Copper, the actual calculated grams/day is 543.78, but they

round down to 540 grams/day. For phosphorous, the actual calculated limit is 4,779.54 g/day, but the permit limit is 4,800 g/day.

Calculation and application of CWF or FWA

Hayes - EPA and MMSD calculations are generally similar, however, EPA's calculations are slightly lower in some instances due to the multiplier used (i.e. MMSD rounded to using 0.08 in the calculations, whereas EPA did not round and multiplied categorical limits by 0.07931).

Application of most stringent limit

Sonoco - For hexane extractable material (HEM), the categorical limit is 5,700 grams per day, and the local limit is 300 mg/L. The permit does clarify which limit is more stringent (and applicable).

C. CA Compliance Monitoring

Documentation of sampling activities

Hayes – MMSD's sampling records do not include pH data.

ETE Reman – The POTW's chain of custody forms do not include sample time delineations (am or pm).

Analysis for all regulated parameters

Sonoco – According to the POTW's SIU sampling instructions, the POTW does not collect samples for the following pretreatment pollutant parameters: arsenic, cadmium, mercury, molybdenum, silver, cyanide, fluoride, manganese, phosphorous and total toxic organics.

ATI Ladish - According to the POTW's sample instructions, the POTW does not sample for the following local limit parameters: arsenic, cadmium, copper, lead, mercury, silver, and cyanide. In addition, the POTW does not sample certain outfalls for molybdenum, zinc, and oil and grease.

ETE Reman - The POTW does not collect samples for the following local limits: arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, and cyanide.

Seidel – According to the POTW's sampling data: (1) in 2021, the POTW did not collect samples for any pretreatment parameters, (2) in 2022, the POTW did not collect samples for any local limit pollutant parameters, and (3) in 2023, the POTW did not collect samples for arsenic, cadmium, chromium, cyanide, HEM, lead, mercury, molybdenum, nickel, and silver.

General Mills - According to the POTW sample analysis results, the POTW does not sample for the following local limits: arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, and cyanide.

Hayes - The POTW does not collect samples for the following pretreatment parameters includes arsenic, mercury, molybdenum, and silver.

Wisconsin Paperboard – The POTW did not collect sample for the following local limits: arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, cyanide, and HEM.

Evaluation of need for slug discharge control plan

Hayes – MMSD did not document its determination of whether Hayes needs a slug plan.

D. CA Enforcement Activities

Identification of discharge violations

Sonoco - On March 15, 2024, MMSD wrote a Notice of Noncompliance letter to Sonoco due to an exceedance of the HEM limits on March 1, 2023. The letter states Sonoco had not previously identified the violation due to an error/not calculating the mass limit from the concentration for HEM. However, this was also not identified by MMSD until Sonoco backchecked the data (i.e., the calculations were not checked by MMSD as well, and the violation was not identified by MMSD).

Publication of SNC

Seidel - Seidel was not in compliance from (1) May to November 2022 and (2) March to July of 2023. However, the IU file did not include documentation showing that MMSD published the IU for being in significant non-compliance.

Escalation of enforcement

Seidel - In 2022, there are enforcement letters (Notices of Noncompliance (NONs), Notices of Continuing Violation (NCVs), etc.) for May, June, July, August, September, October, and November, but the escalation of enforcement does not occur higher than a notice of continuing violation until March 2023, when another violation was identified in February 2023. April 2023, May 2023, and July 2023 also had NCV letters issued.

Hayes - In 2021, there are enforcement letters (NON, NCVs, etc.) for February, March, April, May, June, July, and August, but the escalation of enforcement does not occur higher than a notice of continuing violation. In 2022, NCV letters were issued in March, April, May, November, and December. In 2023, the January 2023 NCV states Hayes proposed a plan to install a new discharge point. Based on the IU visit, this outfall was installed in July 2024. Between the proposed plan and the installation, there were NCVs issued in February, March, August, September, October, November, and December in 2023, and in March, April and May in 2024. In an August 2023 letter, MMSD states if further sampling shows continued noncompliance, further enforcement action would be taken, however, the 2023 NCVs sent after the August letter do not include any additional enforcement action.

E. IU Self-Monitoring

Sampling by IU at frequency specified in control mechanism/regulations

Seidel - The IU permit requires the IU to sample twice per year. However (1) the IU's self-monitoring report did not include any pH sampling results for 2021, and (2) 2022 self-monitoring results only one pH result.

Analysis by IU of all required pollutants in accordance with appropriate sampling techniques and analytical methods

Sonoco – Analytical results do not show whether pH samples are analyzed within the 15 minutes of sample collection. Results only show the time of pH readings at the laboratory.

General Mills - The chain of custody for an oil and grease sample collected on 8/26/21 does not include the sampler's name. The chain of custody does not include the temperature of the sample. In addition, the "relinquished by" and "received by" sections of the chain of custody is blank. A pH value is written on the sheet with the oil and grease sample results. However, the pH results do not include (1) the date, place, method and time of sampling, and the name of the person taking the sample, (2) the date of analysis, (3) who performed the analysis, and (4) the analytical techniques/methods used.

Periodic self-monitoring reports submitted by IU

Wisconsin Paperboard – The IU emails periodic self-monitoring reports.²

Reporting by IU on all required pollutants

ATI Ladish - For a sample collected on 3/5/21, the self-monitoring report doesn't include results for fluoride. For a sample collected on 10/6/22, the monitoring report does not include results for cyanide, lead, arsenic, cadmium, lead, copper, mercury, and silver. For a sample collected on 1/12/2023, the sample analysis report does not include results for fluoride, arsenic, cadmium, copper, lead, mercury, and silver. A self-monitoring report for a sample collected on May 2, 2024, did not include results for ammonia, cyanide, lead, zinc, arsenic, cadmium, copper, HEM, mercury, molybdenum, and silver.

Seidel - Missing pH results for all of 2021, and once in 2022.

Hayes - April 2024 sampling results is missing data from cadmium, chromium, copper, cyanide, lead, nickel, silver.

IU signatory/certification of reports

² Per the Cross-Media Electronic Reporting Rule, it is not proper to email scans of self-monitoring reports.

ETE Reman - A June 21, 2024, report includes a certification for metal finishers. The IU, however, is not subject to metal finishing standards.

Seidel - The self-monitoring reports do not include certifications by the IU.

IU notification within 24-hours of becoming aware of discharge violations including slug loading or accidental spill

Sonoco and ETE Reman - The IUs do not notify MMSD of discharge violations within 24 hours of becoming aware of them. MMSD does not cite the IUs for these failures to notify.

Hayes - The IU did not notify MMSD within 24 hours of becoming aware of zinc and HEM exceedances that occurred on the following dates:

- March 1 to 2, 2022; and
- March 16 to 17, 2022.

MMSD did not cite the IU for these failures to notify.

Resampling/reporting by IU within 30 days of knowledge of violation

Sonoco – MMSD issued the following enforcement documents to the IU for exceeding HEM limits on the following dates:

- January 2024;
- March 15, 2024; and
- May 14, 2024.

MMSD found these violations after reviewing the IU's self-monitoring reports. The IU did not (1) repeat HEM sampling and analysis and (2) submit the results of the repeat analysis within 30 days of becoming aware of each violation. MMSD however, did not cite the IU for these violations.

Hayes – For each of the cases listed below, the IU's discharge exceeded pretreatment standards. In addition, the IU did not (1) repeat sampling and analysis and (2) submit the results of the repeat analysis within 30 days of becoming aware of each violation. MMSD however, did not cite the IU for these violations.

- A HEM effluent limit exceedance on March 17, 2022;
- A monthly average exceedance for zinc in March 2022;
- A September 2022 violation reported by Hayes; and
- March 30 to 31, 2023, sampling showing zinc and HEM exceedances.

Notification by IU of significant changes in discharge

Sonoco - Data from February 2021 shows a self-reporting flow of 20,080 gallons; data from August 2022 data shows a flow of 78,910 gallons. There is not documentation in the IU files indicating Sonoco notified MMSD of this substantial change in discharge.

SECTION 5.0: INDUSTRIAL USER SITE VISITS

Sonoco
8500 W Tower Avenue
Milwaukee, WI 53224

Date of site visit: July 10, 2024

Inspection Participants:

Sonoco:
Paul Najam, Engineering and Facilities Manager
Ron Krueger, Engineering Supervisor

Milwaukee MMSD
Matt Kulinski, Senior Industrial Waste Engineer

EPA
Jennifer Bush, Environmental Scientist

WDNR
Jacob Van Susteren-Wedesky, Regional Pretreatment Coordinator

EPA, WDNR, and MMSD arrived at Sonoco (Sonoco or Facility) at approximately 11:35 a.m. CDT and were met at the front by Paul Najam (Engineering and Facilities Manager) and Ron Krueger (Engineering Supervisor). EPA, WDNR, and MMSD staff watched a safety video in order to begin the inspection. Once the video was completed, EPA staff showed Sonoco staff their credentials and began the Opening Conference. MMSD took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, WDNR, and MMSD by Sonoco staff:

- General Plant Information/History:
 - Sonoco has changed ownership multiple times over the years.
 - Miller Plant opened in 1974 and made aluminum cans.
 - Reynolds bought the facility in the mid-1980's.
 - Reynolds sold the facility in the early 1990's to Ball.
 - Around 2000, Ball added the food can line, which was completely up and running in 2003. At this time, beverage cans were removed from the process.

- Approximately 4 years later, Ball added another food line located where the beverage can line was previously held. This allowed for the company to add different can sizes to the process.
- Approximately 10 years ago, Ball sold 51% of the company to Metal Pack, and became Ball Metal Pack.
- Ball Metal Pack sold all plants to Sonoco once the new steel can line was up and running (approximately in year 2022).
- There are approximately 150 employees onsite.
- Employees are broken up into two groups, which determines the shifts they work. This is referred to as a 4-3 schedule, with employees either working the front or back part of the week, with Wednesday as a flip day.
- Sonoco is open 24 hours, 7 days a week.
- There is scheduled maintenance for 2 weeks in February, one day in May, and one day in November.
- Maintenance includes cleaning, equipment switch-outs, etc.
- Sonoco is regulated under 40 C.F.R. § 465.45, as a new source.
- Since the last inspection conducted by MMSD, Sonoco has received multiple Notice of Noncompliance letters from MMSD. Sonoco has added an equipment piece due to these noncompliance issues. After installation of the new equipment, MMSD collected a sample (mid-June), which indicated Sonoco's discharge was in compliance. MMSD plans to take another sample before allowing Sonoco to return to their normal sampling schedule. If the new equipment does not keep Sonoco in compliance with their permit limits, Sonoco will have to complete TTO sampling.
- Sonoco is in the process of considering updates to the pretreatment system onsite. This includes meeting with vendors and reviewing pretreatment concepts.
- Sonoco is required to notify WDNR and approve the plan once a concept/pretreatment system is selected.
- Sonoco told EPA the reason for updating the pretreatment system is due to the current system being outdated. Sonoco said the system is operating fine, but the company is looking for more efficiency and less maintenance hours to increase their production capacity.
- Sonoco staff includes chemical processors. Part of their job duty is to monitor the wastewater process and do daily checks and record keeping.
- Line 1 (new line) discharges 25,000 gallons per day. Line 2 (older line) is discharging 50,000 gallons per day but is producing less than half the number of cans as the newer line (the older process is not as efficient as the newer line).
- Sonoco is currently producing approximately 4.5 million cans per day, but the target is closer to 5 million cans per day. MMSD requested Sonoco asked for this change to be reported on self-monitoring reports if the higher rate is achieved. Sonoco told MMSD the flow rate has been staying consistent, only the number of cans produced may be increasing.
- Manufacturing Process:
 - Sonoco is a steel can making facility.

- Sonoco confirmed to MMSD that no manufacturing updates have occurred at the facility since the last inspection.
- Line description: After body makers, the cans go through a coolant/oil bath, then through washers. The body makers generate a lot of heat. Sonoco described the washers as an industrial sized dishwasher.
- The can washer has pre-wash, wash, drag-out, rinse, and DI water as the final rinse.
- Once cans are washed, products proceed to wash coat, which is a protective coating.
- After wash coat is added, this has to be baked onto the cans. Then, cans are inspected with a nickel inspection camera.
- Cans are then beaded and light tested to show if there are any holes in the cans.
- Next is an internal enamel coating, which acts as a protective coating and prevents discoloration.
- After internal coating, cans proceed to the palletizer.
- Production areas are cleaned three times per day, once per shift.
- Sonoco utilizes City of Milwaukee water in the process.
- Pretreatment:
 - An equalization tank for oily wastewater is in the pretreatment room. A coalescer is right after the equalization tank, and then the wastewater discharges to the pretreatment process.
 - The coalescer has been recommissioned. This was in place when the beverage lines were running, and it was taken down when the beverage line was removed. This same coalescer was brought back online.
 - The coalescer slows the flow of the discharge down, allowing oil to rise. This extends to the settling tank.
 - The pretreatment onsite raises pH with sodium hydroxide to 7 through polymer addition (cationic and anionic polymer).
 - After the polymer addition, the discharge goes through a mixing, proceeds to the DAF, and then discharges.
- Waste Generation:
 - There is one outfall to MMSD, outside of the building. Inside the building there is a labeled outfall, which contains only the process wastewater going through pretreatment.
 - Line 1 has a flow rate of 10-15 gallons per minute.
 - Line 2 has a flow rate of 25 – 30 gallons per minute.
 - RO water is used on Line 2, and Sonoco may use RO water on Line 1 in the future as well. However, this will not be within the next year.
 - All floor drains throughout the facility are piped to the onsite pretreatment.
 - All washer water is discharged into an underground sump, which is sent to the pretreatment system. This is a 50,000-gallon tank.
 - Sonoco also discharges boiler blowdown and domestic waste to MMSD. There is no non-contact cooling water in the facility.
 - Oily waste is hauled offsite, and MMSD is provided with hauled waste manifests.
 - Sludge is generated from the press onsite. However, Sonoco told EPA they couldn't use the press because recently the filter cakes were too oily, and sludge generation in the

last month was decreased to 0 pounds. The sludge was hauled offsite instead. The sludge press will be recommissioned now that the coalescer is back online and oil can be removed. Sonoco hopes to eliminate sludge hauling fees. The press was not running at the time of the IU site visit.

- Excess steel is saved and recycled offsite.
- Wastewater Sampling:
 - Sonoco uses Spectrum Engineering for all wastewater sampling.
 - Sonoco told MMSD a third party calibrates the flow meters onsite quarterly.
 - Sonoco utilizes Eurofins Laboratory for sample analysis.

Plant Walk Through

Sonoco staff showed EPA, WDNR, and MMSD staff the following during the plant walk through:

- Beginning product
- Body Makers
- Can Washers
- Recommissioned coalescer (not running at time of IU inspection)
- Storage room;
 - No floor drains and floor is sloped in order for liquids to stay in room.
- Pretreatment Room
- Sampling Location
 - DAF overflows into sampling tank.
- Final Products

Records Review

During the opening conference MMSD requested documents as part of the WWTP inspection. Documents requested by MMSD included monitoring data, calibration records, maintenance documents, and proof of contact information in case of slug/spills onsite.

Closing Conference

EPA, WDNR, and MMSD staff completed the site walk through at 1:30 p.m. CDT. A closing conference was held with EPA, WDNR, MMSD, and Sonoco staff. The close conference ended at 1:34 p.m. CDT.

Hayes Performance

5800 W. Donges Bay Road
Mequon, Wisconsin 53092

Date of site visit: July 10, 2024

Inspection Participants:

Hayes Performance:

Sam Schroetter, Manager of Safety, Maintenance, and Facilities

Milwaukee MMSD

Matt Kulinski, Senior Industrial Waste Engineer

EPA

Jennifer Bush, Environmental Scientist

WDNR

Jacob Van Susteren-Wedesky, Regional Pretreatment Coordinator

EPA, WDNR, and MMSD staff arrived at Hayes Performance (Hayes or Facility) at approximately 2:00 p.m. CDT and were met at the front by Sam Schroetter (Manager of Safety, Maintenance, and Facilities). EPA staff showed Hayes staff their credentials and began the Opening Conference. MMSD took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, WDNR and MMSD by Hayes staff:

- General Plant Information:
 - There are approximately 215 employees.
 - The Facility is open 16 hours per day, 5 days per week with 2 shifts.
 - Hayes has a scheduled shutdown each year during the week between Christmas and New Year's Eve. This shutdown is typically used as a holiday, but sometimes maintenance will be conducted as well.
 - Since the last inspection conducted by MMSD, there have been multiple HEM and Zinc violations.
 - Hayes has been working on the addition of an outfall. This will be used to sample just the process wastewater prior to being mixed with domestic waste. This would mean the combined wastestream formula (CWF) currently in use may no longer be needed in the future. Hayes and MMSD agreed the calculated dilution of the CWF impacted the number of violations.
 - The new outfall will be on the south end of the facility, downstream of the clarifier, but prior to discharging to the City outfall.
 - The current IU permit in place at Hayes has approximately one year left until permit renewal is needed. The new outfall will be added to the new permit.
- Manufacturing Process:
 - The process onsite has 6 different phases, including:
 - Zinc phosphate;
 - Hard coat anodizing;
 - Parts washer;
 - Pressure washer;
 - Vibratory deburring; and
 - Machine cooling.

- Hayes staff told EPA they infrequently use the hard coat and anodizing, with the last time used being an estimated 1-2 months prior. Before the last use, Hayes estimated it had not been used in about 1 year.
- There have been no production or flow changes greater than 20% since the last inspection, all rates have stayed consistent at Hayes.
- Staff clean their work areas once per shift.
- There is chemical storage in the hazardous waste shed and cabinets near the process line. All drums are stored on secondary containment. Chemicals stored in the drums include brake fluid and isopropyl alcohol.
- Hayes machines and assembles brake systems for off-road recreational equipment, power sports, lawn care, and government defense.
- Pretreatment:
 - Onsite, Hayes conducts pH adjustment, calcium chloride addition, polymer and coagulant addition, and clarification prior to discharging.
 - There are trained staff onsite at all times for pretreatment work.
 - Staff record all pH and maintenance work, and pH meters are calibrated weekly.
 - Hayes has a maintenance software for record keeping.
 - Hayes staff told EPA, WDNR, and MMSD that there is a phone number posted for emergency contacts in case of a slug discharge event on site.
 - Hayes runs an environmental management system internally to keep all internal spreadsheets.
- Waste Generation:
 - Hayes provided information on the discharge rate at each part of the process onsite:
 - Zinc phosphate, discharges ~ 6 gallons per minute (gpm);
 - Hard coat anodizing, discharges ~ 3 gpm;
 - Parts washer, discharges in batches of 100-300 gallons;
 - Pressure washer, wastewater is hauled offsite;
 - Vibratory deburring, wastewater is hauled offsite; and
 - Machine cooling, wastewater is hauled offsite.
 - At the time of the inspection, Hayes was hauling machine coolant, which was being stored in an IBC tote.
 - Once the new outfall is discharging, Hayes stated it will go back to discharging waste instead of hauling.
 - There were no visible floor drains throughout the facility, but there are troughs. One is sealed from the pretreatment/discharge area and is self-contained, and the other is from the zinc phosphating line, which discharges to pretreatment.
 - All water used onsite is from a private well, not City water.
 - Covanta is used for hauled waste. In February, March, April, and June, Hayes hauled waste offsite two times each month, at approximately 5,000 gallons per event. Hayes estimates the hauled amount will decrease to 1,500 gallons once the new outfall is up and running.
 - Hayes discharges domestic waste, process wastewater, and boiler blowdown.

- There is a filter press onsite, which generates approximately half of a barrel of sludge per month. The total sludge storage onsite is 9-10 barrels. Covanta is used to haul sludge offsite, which is then brought to a centralized waste treater.
- Solid waste is also accumulated onsite, including iron and aluminum scraps, aluminum castings and breakages, and stainless steel. This waste is hauled to Waukesha Iron and Metal for recycling.
- In 2023, Hayes recycled the following amounts:
 - Aluminum: 147,482 pounds;
 - Cast Iron: 166,560 pounds;
 - Copper: 19 pounds;
 - Mixed Metal: 67,826 pounds; and,
 - Steel: 10,642 pounds.
- The parts washer, which currently is discharged in batches, may be switched to a continuous discharge once the new outfall is online. This will depend on the production level.

Wastewater Sampling:

- Sigma Environmental Consultants are used for sampling, and Eurofins Laboratory is used for sample analysis.
- Hayes told EPA, WDNR, and MMSD that recently the staff have had to complete resampling and additional sampling due to the increased monitoring requirements from MMSD. The frequency at the time of the inspection was 2 times per month.

Plant Walk Through

Hayes Performance staff showed EPA inspectors, WDNR, and MMSD staff the following during the plant walk through:

- Main Warehouse Floor
 - Assembly and machining (dry processes).
 - There is a mop bucket on the assembly floor that pumps to the onsite pretreatment system.
 - There are some washers on the assembly floor, but they are self-contained and pumped to be hauled offsite.
- Test Laboratory Area
 - This area has a condensate catch that discharges to the onsite pretreatment system. This adds humidity to test products. This is utilized in a spray chamber in the lab.
 - Two drums of brake fluid were in the lab area at the time of the walk through.
- Vehicle Storage
 - This area is where staff conduct brake testing onsite.
- Pre-production/prototype Area
 - No wastewater.
- Zinc Phosphating Area
 - The line begins with a cleaner (DynaClean), then proceeds to a rinse tank, then zinc phosphate, then a final rinse tank.

- Overflow from the rinses go to the floor troughs mentioned during the Opening Conference.
- Caustic is added to adjust pH, then water is held in a holding tank. The new outfall is connected to the holding tank, after the pretreatment on the Zinc Phosphating line.
- Hard Coating
 - Sulfuric acid is added to the rinse tank, then the wastewater is discharged to the onsite pretreatment system.
- Materials/Staging Area
- Furnace Area
 - Test rubber components in this area.
- Sampling Location
 - Outside manhole.

Records Review

EPA staff reviewed laboratory reports from self-monitoring and MMSD sampling prior to the site visit. However, during the opening conference MMSD requested documents as part of the inspection. Documents requested include a pipe and updated pretreatment system diagram, and a photo of the slug discharge emergency contact information posting in the warehouse floor (it was not seen by EPA, WDNR, or MMSD during the site walk through).

Closing Conference

EPA, WDNR, and MMSD staff completed the site walk through at 3:45 p.m. CDT. A closing conference was held, which ended at 3:50 p.m. CDT. EPA, WDNR, and MMSD staff left Hayes Performance at 3:52 p.m. CDT and returned to the wastewater treatment plant.

Wisconsin Paperboard
1514 E. Thomas Avenue
Milwaukee, WI 53211

Date of site visit: July 9, 2024

Inspection Participants:

Wisconsin Paperboard

Mike Grover, General Manager
 David Schuelke, Technical Director

EPA
 Newton Ellens, Pretreatment Program Manager
 Eric Small, Physical Scientist

Wisconsin DNR
 Richard Douglas, WDNR Pretreatment Coordinator

MMSD

Elizabeth Stroik, Senior Industrial Waste Engineer

EPA Region 5, Wisconsin DNR, and Milwaukee Metropolitan Sewerage District (MMSD) personnel arrived at Wisconsin Paperboard (“Grief” or “Facility”) at 2:10 P.M. for an announced inspection and were greeted by two Facility representatives: Mr. Mike Grover (General Manager) and Mr. David Schuelke (Technical Director). EPA staff showed Mr. Grover and Mr. Schuelke their credentials and began the Opening Conference. MMSD took over the opening conference after EPA Completed introductions and a site visit overview. The following information was provided to EPA, Wisconsin DNR, and MMSD by Facility staff:

- General Plant Information:
 - Newark Group might be the correct name for the Facility, and this name change will likely be reflected in the new permit.
 - The Facility employs 175 employees and operates on three shifts, 24 hours/day, and 7 days/week.
 - The Facility has had multiple shutdowns this year – usually lasting between 1-2 days – with the next shutdown expected the week of July 8th for three days. During shutdowns, the quantity of water discharged to MMSD is reduced.
 - Grief has one other entity within MMSD’s service area, but they are under a different division.
 - The Facility has not experienced any flooding in recent history.
 - The Facility’s NAICS code is 322130.
 - The Facility has six outfalls that discharge to MMSD, labelled as Outfalls 3.0, 5.0, 8.0, 12.0, 13.0, and 14.0.
 - Outfall 3.0 flows to west, north of the southwestern corner of Building 1, and contains only process wastewater from Outfall 3.1.
 - Outfall 5.0 flows south — 330 feet north of the southwestern corner of Buildings 2 and 3 and then flows east south of Building 15 – and only contains domestic wastewater and stormwater.
 - Outfall 8.0 flows east from Building 1, north of Building 5, and contains only domestic wastewater and stormwater.
 - Outfall 12.0 flows east from the Powerhouse and contains only domestic wastewater.
 - Outfall 13.0 flows east from the Powerhouse and contains only domestic wastewater.
 - Outfall 14.0 flows south and then west from Buildings 2 and 3 and only contains domestic wastewater.
 - The Facility maintains five buildings; the “Powerhouse” consists of both Buildings 3 and 4.
 - MMSD personnel identified during the inspection that Wisconsin Paperboard – Wisconsin Paperboard has historically sent Excel documents of their semi-annual reports to the Control Authority and requested that reports be sent in the mail with a “wet-ink signature” moving forward.

- Manufacturing Information:

- The Facility's only raw material is 100% recycled paper, which is re-slurred and reformed.
- Water is recirculated and evaporated in the manufacturing process, with final product containing about 7% water.
- Facility personnel indicated that there have not been any substantial changes to the manufacturing processes, outside of general operation and maintenance, since the last inspection.
- The Facility utilizes four pulping tanks – two primary and two secondary tanks – to combine chemicals and water, generating a slurry to break down paper.
- The mixture of recycled water and pulp is known as "whitewater" at this Facility.
- The Facility process diagram is described as wastepaper goes through a pulping system and proceeds to enter a cyclone to remove dense solids. Following the cyclone, the product is screened, pressed against a felt belt, and rolled around heated rollers. Once rolled, the wastepaper is sized, waxed, and sometimes treated with other agents to produce paperboard.
- The Facility budgets for 450 tons of wastepaper per day, and the Facility has recently averaged about 486 tons of wastepaper per day.
- The Facility routinely squeegees and cleans the floor.
- Wisconsin Paperboard uses waste paper from three sources: (1) pre-consumer, from paper converting facilities, (2) post-consumer, from commercial and industrial sources, and (3) post-consumer, from residential recycling programs.
- Two large sumps collect process wastewater, which flows to a "Krofta Feed Tank" that can direct wastewater into a floatation clarifier and dissolved air floatation system prior to it being returned and sent back to the start of the system.
- The Facility no longer generates black paperboard, a change since the last inspection.
- Wastewater discharge cycles on and off to balance flow in the mill, with flow fluctuating between 25 and 442 gallons per minute.
- Waste from the Facility is hauled off in 53-foot trailers (approximately 50 a month) to Metro and Orchard Hill Ridge Landfills.
- The Facility purchased a new freezer for sample quality control in 2024, as well as a new flow meter within the last couple of years.
- pH sampling is conducted and logged during the papermaking process. Facility personnel indicated that calibration occurs frequently by Nalco representatives, but there is no log to corroborate dates calibrated.
- The Powerhouse Operator is the designated sampler for this Facility and samples where the "whitewater" is generated.
- Pollution prevention equipment practices in use at this Facility include an overflow alarm, an evaporator, a flow restrictor, heat reclamation, and a backflow preventer.
- Chemicals located at this Facility are stored in totes and drums, primarily in the basement of Building 5. Process chemicals are the only chemical agents located within the process area.
- Flow monitoring occurs in the basement of Building 1, which contains a 3" Parshall Flume.

- Eurofins analyzes self-collected samples for total suspended solids and biological oxygen demand.
- While internal TSS sampling is conducted at the Facility's primary discharge point, the Facility does not maintain a certified lab and, therefore, MMSD states that they do not need to report this information to the Control Authority.
- Sampling is conducted using flow composite sampling methods.
- **Pretreatment Information:**
 - A Nalco Water proprietary biocide is utilized in the process, but Mr. Schuelke confirmed it does not contain chlorophenolic compounds and has been consistently used since the last MMSD inspection.
 - The pretreatment process is centrally located between Building 1 and Building 2.
 - Wisconsin Paperboard contains an Impco Disk Filter that operates under vacuum, helping to suck solids/fibers out of the system prior to effluent discharge.
 - The pretreated wastewater begins with a mixture of pulp and water whereby an inline polymer addition is used. After going through dissolved air floatation, wastewater is returned to the recycling tank, or discharged, depending on composition.
 - A grit removal unit is located in the beginning of the pretreatment process as well, which was not indicated during the last inspection.
 - The Impco Disk Filter is serviced on a yearly basis.
 - The process is facilitated by technicians who operate the pulping and forming equipment.
 - Effluent from the recycle tank is sampled daily for total suspended solids, totalized flow. BOD is sampled weekly.

Plant Walk Through

Wisconsin Paperboard staff showed EPA inspectors, Wisconsin DNR, and MMSD staff the following during the plant walk through, which began at 4:18 pm CT:

- Paper Machine #1
- Hach AS 950 with Pulsar Motor Sampler
- Impco Disc Filter
- Primary clarifier for effluent
- Flume with effluent discharging at a rate of 66.6 gallons per minute
- Sampler fridge with thermometer

Records Review

During the inspection, MMSD personnel requested a Safety Data Sheet for the Nalco biocide used in the Facility's process to confirm that it does not contain chlorophenolic compounds.

Closing Conference

EPA Region 5, Wisconsin DNR, and MMSD staff completed the site walkthrough and a closing conference commenced at 4:40 pm CT with Facility staff; the closing conference was conducted by Elizabeth Stroik and accompanied by the aforementioned regulatory personnel. The closing conference ended at 4:46 pm CT.

SECTION 6.0: OTHER DISCUSSIONS

- EPA asked if MMSD is required to conduct periodic technical re-evaluations of its local limits. WDNR stated that MMSD is not required to conduct periodic technical re-evaluations of its local limits.
- Streamlining:
 - It is not clear whether WDNR has approved MMSD’s streamlining updates to its pretreatment program. MMSD is authorized to implement certain provisions of its program (e.g., designating CIUs as “mid-tier” CIUs) only if WDNR has approved streamlining updates to the POTW’s pretreatment program.
 - WDNR asked MMSD for a copy of the State’s approval of MMSD’s streamlining updates to its pretreatment program.
 - MMSD stated that the following except from Section 11.804(3)—of MMSD’s SUO—is a streamlining reference:
 - The schedule shall provide for at least one inspection per year and three sampling events per year, unless the applicable federal and state regulations allow a reduced schedule and the user’s compliance history, discharge schedule, mass of discharged pollutants, or other factors make a reduced schedule appropriate.
 - WDNR stated that MMSD must document streamlining updates in its pretreatment manual and/or ERP.
 - Regarding MMSD’s “mid-tier” CIU designations [under 40 C.F.R. § 403.12(e)(3)]: According to MMSD’s 2023 annual report, the following CIUs have reduced inspection and/or self-monitoring frequencies, but were in significant noncompliance:
 - Perlick Corporation,
 - Pho-Tronics H&T Global Circuits LLC,
 - Refinishing and Plating LLC,
 - Stainless Foundry and Engineering Inc.,
 - Unico of New Berlin,
 - Wenthe-Davidson Engineering Co., and
 - Chrometech of Wisconsin.

SECTION 7.0: POST-INSPECTION ACTIVITY

On August 1, 2024, MMSD submitted additional sample analysis data for the following SIUs:

- General Mills,
- ETE Reman,
- Hayes,

- Sonoco,
- Seidel,
- ATI Ladish, and
- Wisconsin Paperboard.

SECTION 8.0: SUMMARY OF FINDINGS

A. Areas of Concern

#	Regulatory Citation	Site Background & Inspection Observations	Report Section
1	40 C.F.R. § 403.12(l)	Instead of requiring IUs to submit a signed certification with each self-monitoring report, MMSD requires each IU to submit an initial “wet ink” signature, then submit scans of signed certifications in subsequent self-monitoring reports. MMSD staff would then compare each scanned signature with the “wet ink” signature on file.	3.0 E.
2	40 C.F.R. § 403.8(f)(2)(viii)	MMSD does not use the significant noncompliance criteria under 40 C.F.R. § 403.8(f)(2)(viii)(H): “Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.”	3.0 F.
3	40 C.F.R. § 403.8(f)(5)	MMSD uses informal compliance schedules to address certain types of IU noncompliance. However, informal compliance schedules are not part of MMSD’s Enforcement Response Plan (ERP).	3.0 F.
4	WPDES Permit No. WI0036820, Section 4.3.3.3.	Seven percent of MMSD’s sewer system is combined. MMSD requires an IU (WE Energy Power Plant) to stop discharging wastewater to the sewer during combined sewer overflows (CSOs). This requirement, however, is to satisfy groundwater-related requirements, not the requirements under the “nine minimum controls” provision in MMSD’s WPDES permit. There are other IUs that discharge to MMSD’s combined sewers, but MMSD does not require those IUs to stop discharging during CSOs.	3.0 G.

	40 C.F.R. Part	File Reviews	Report Section
5	40 C.F.R. § 403.8(f)(1)(iii)(B)(2)	MMSD's IU permits do not require each IU to (1) give the District prior notification of a permit transfer, and (2) provide a copy of the existing permit to the new owner or operator.	4.3 A.
6	40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	ATI Ladish - The lead limit in the IU permit (6.0 mg/L) does not match the lead local limit in the SUO (2.0 mg/L).	4.3 A.
7	40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	The IU permits for Sonoco, ATI Ladish, Seidel, and Hayes do not include a description of the required process for seeking a waiver for a categorical pollutant not present nor expected to be present.	4.3 A.
8	40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Sonoco and Hayes – The IU permit does not require sampling for fluorine, manganese, and TTOs (categorical limits). The IU file, however, does not include documentation showing that the POTW has waived monitoring requirements for these pollutants.	4.3 A.
9	40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Sonoco - The flow proportional composite sampling requirements do not indicate the required sample duration.	4.3 A.
10	40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Hayes - The permit requires flow proportional composite samples over the period of a discharge, up to a maximum of 24 hours, instead of requiring a 24-hour flow proportional composite. The IU file does not include documentation of the decision to allow alternative sampling.	4.3 A.
11	40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	ATI Ladish - Part 3.01 2) a) of the IU permit requires flow reporting for only one of the five outfalls (Outfall 7.0). It does not require flow reporting for Outfalls 9.1, 19.0, 21.0, and 21.1.	4.3 A.
12	40 C.F.R. § 403.8(f)(1)(iii)(B)(4) and 40 C.F.R. § 403.16(c)	Sonoco, Seidel, and Hayes – Upset notification requirements in these IU permits do not require the IU to report when an upset is expected to end if the event is still ongoing.	4.3 A.
13	40 C.F.R. § 403.8(f)(1)(iii)(B)(4) and 40 C.F.R. § 403.17(c)	ATI Ladish, ETE Reman, General Mills and Wisconsin Paperboard - Bypass notification requirements in these IU permits do not require the IU to report steps taken to reduce and eliminate bypasses.	4.3 A.
14	40 C.F.R. § 403.8(f)(1)(iii)(B)(4) and 40 C.F.R. § 403.12(j)	For Sonoco, ATI Ladish, ETE Reman, Seidel, General Mills Operations, Hayes, and Wisconsin Paperboard: The notification of significant discharge requirement in each IU permit does not require the IU to notify the District in advance of a substantial change in the volume or character of the discharge.	4.3 A.
15	40 C.F.R. § 403.8(f)(1)(iii)(B)(6)	Sonoco – According to an MMSD inspection report, Sonoco has a slug discharge control plan. However, the IU permit does not include a requirement to control slug discharges.	4.3 A.
16	40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	ATI Ladish - The production-based standards calculations (for Outfall 7.0) include a multiplier for categorical limits. It is not clear where this multiplier comes from. Also, the calculation includes a "Ferrous	4.3 B.

		Allowances" spreadsheet for Outfall 7. The spreadsheet states, "Categorical Pretreatment Standards are from Table VII-21 - Summary of Treatment Effectiveness (p.1414) and Table VII-22 - Summary of Treatment Effectiveness for Selected Non-conventional Metal Pollutants (p.1415) from Development Document for Effluent Limitations Guidelines and Standards for the Nonferrous Metals Forming and Metal Powders Point Source Category." The IU hammers and presses steel, but there are no limits for forging from Part 420 (Iron and Steel).	
17	40 C.F.R. § 403.8(f)(2)(iii)	Sonoco - The Permit classifies Sonoco as a new source; however, the inspection report lists part of the process as an existing source.	4.3 B.
18	40 C.F.R. § 403.8(f)(2)(iii)	ATI Ladish - The IU permit includes pretreatment standards for existing sources. However, the IU file does not include information showing when the facility was constructed.	4.3 B.
19	40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	Sonoco - MMSD does not document the calculations of the production-based standards. MMSD rounds their grams/day calculations to the nearest whole number (sometimes higher, sometimes lower than actual calculated grams per day). For example, chromium grams per day calculation is 125.91 grams, but the permit limit is 130 grams/day. For Copper, the actual calculated grams/day is 543.78, but they round down to 540 grams/day. For phosphorous, the actual calculated limit is 4,779.54 g/day, but the permit limit is 4,800 g/day.	4.3 B.
20	40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	Hayes - EPA and MMSD calculations are generally similar, however, EPA's calculations are slightly lower in some instances due to the multiplier used (i.e. MMSD rounded to using 0.08 in the calculations, whereas EPA did not round and multiplied categorical limits by 0.07931).	4.3 B.
21	40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	Sonoco - For hexane extractable material (HEM), the categorical limit is 5,700 grams per day, and the local limit is 300 mg/L. The permit does clarify which limit is more stringent and applicable.	4.3 B.
22	40 C.F.R. § 403.8(f)(2)(v)	Hayes - pH readings are not documented within sampling records.	4.3 C.
23	40 C.F.R. § 403.8(f)(2)(vii)	ETE Reman – The POTW's chain of custody forms do not include sample time delineations (am or pm).	4.3 C.
24	40 C.F.R. § 403.8(f)(2)(v)	Sonoco – According to the POTW's SIU sampling instructions, the POTW does not collect samples for the following pretreatment pollutant parameters: arsenic, cadmium, mercury, molybdenum, silver, cyanide, fluoride, manganese, phosphorous and total toxic organics.	4.3 C.
25	40 C.F.R. § 403.8(f)(2)(v)	ATI Ladish - According to the POTW's sample instructions, the POTW does not sample for the following local limit parameters: arsenic,	4.3 C.

		cadmium, copper, lead, mercury, silver, and cyanide. In addition, the POTW does not sample certain outfalls for molybdenum, zinc, and oil and grease.	
26	40 C.F.R. § 403.8(f)(2)(v)	ETE Reman – MMSD’s sample analysis reports do not include results for the following local limit parameters: cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, and cyanide.	4.3 C.
27	40 C.F.R. § 403.8(f)(2)(v)	Seidel – According to the POTW’s sampling data: (1) in 2021, the POTW did not collect samples for any pretreatment parameters, (2) in 2022, the POTW did not collect samples for any local limit pollutant parameters, and (3) in 2023, the POTW did not collect samples for arsenic, cadmium, chromium, cyanide, HEM, lead, mercury, molybdenum, nickel, and silver.	4.3 C.
28	40 C.F.R. § 403.8(f)(2)(v)	General Mills - According to the POTW sample analysis results, the POTW does not sample for the following local limits: arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, and cyanide.	4.3 C.
29	40 C.F.R. § 403.8(f)(2)(v)	Hayes – MMSD’s sample analysis reports do not include results for the following local limits: arsenic, mercury, molybdenum, and silver.	4.3 C.
30	40 C.F.R. § 403.8(f)(2)(v)	Wisconsin Paperboard – MMSD’s sample analysis reports do not include results for the following local limits: arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, silver, zinc, cyanide, and HEM.	4.3 C.
31	40 C.F.R. § 403.8(f)(2)(vi)	Hayes – MMSD did not document its determination of whether Hayes needs a slug plan.	4.3 C.
32	40 C.F.R. § 403.8(f)(2)(v)	Sonoco - On March 15, 2024, MMSD wrote a Notice of Noncompliance letter to Sonoco due to an exceedance of the HEM limits on March 1, 2023. The letter states Sonoco had not previously identified the violation due to an error/not calculating the mass limit from the concentration for HEM. However, this was not identified by MMSD until Sonoco backchecked the data (i.e., the calculations were not checked by MMSD as well, and the violation was not identified by MMSD).	4.3 D.
33	40 C.F.R. § 403.8(f)(2)(viii)	Seidel - Seidel was not in compliance from (1) May to November 2022 and (2) March to July of 2023. However, the IU file did not include documentation showing that MMSD published the IU for being in significant non-compliance.	4.3 D.
34	40 C.F.R. § 403.8(f)(5)	Seidel - In 2022, there are enforcement letters (Notices of Noncompliance (NONs), Notices of Continuing Violation (NCVs), etc.) for May, June, July, August, September, October, and November, but the escalation of enforcement does not occur higher than a notice of continuing violation until March 2023, when another violation was	4.3 D.

		identified in February 2023. April 2023, May 2023, and July 2023 also had NCV letters issued.	
35	40 C.F.R. § 403.8(f)(5)	Hayes - In 2021, there are enforcement letters (NON, NCVs, etc.) for February, March, April, May, June, July, and August, but the escalation of enforcement does not occur higher than a notice of continuing violation. In 2022, NCV letters were issued in March, April, May, November, and December. In 2023, the January 2023 NCV states Hayes proposed a plan to install a new discharge point. Based on the IU visit, this outfall was installed in July 2024. Between the proposed plan and the installation, there were NCVs issued in February, March, August, September, October, November, and December in 2023, and in March, April and May in 2024. In an August 2023 letter, MMSD states if further sampling shows continued noncompliance, further enforcement action would be taken, however, the 2023 NCVs sent after the August letter do not include any additional enforcement action.	4.3 D.
36	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(e)(1)	Seidel - The IU permit requires the IU to sample twice per year. However (1) the IU's self-monitoring report did not include any pH sampling results for 2021, and (2) 2022 self-monitoring results only one pH result.	4.3 E.
37	40 C.F.R. § 403.8(f)(2)(iv), 40 C.F.R. § 403.12(g)(5), and 40 C.F.R. § 136.3, Table II	Sonoco – Analytical results do not show whether pH samples are analyzed within the 15 minutes of sample collection. Results only show the time of pH readings at the laboratory.	4.3 E.
38	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(o)(1)	General Mills - The chain of custody for an oil and grease sample collected on 8/26/21 does not include the sampler's name. The chain of custody does not include the temperature of the sample. In addition, the "relinquished by" and "received by" sections of the chain of custody is blank. A pH value is written on the sheet with the oil and grease sample results. However, the pH results do not include (1) the date, place, method and time of sampling, and the name of the person taking the sample, (2) the date of analysis, (3) who performed the analysis, and (4) the analytical techniques/methods used.	4.3 E.
39	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(h)	Wisconsin Paperboard – The IU emails spreadsheets for periodic self-monitoring.	4.3 E.
40	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(e)(1)	ATI Ladish - For a sample collected on March 5, 2021, the self-monitoring report doesn't include results for fluoride. For a sample collected on October 6, 2022, the monitoring report does not include results for cyanide, lead, arsenic, cadmium, lead, copper, mercury, and silver. For a sample collected on January 12, 2023, the sample analysis report does not include results for fluoride, arsenic, cadmium, copper,	4.3 E.

		lead, mercury, and silver. A self-monitoring report for a sample collected on May 2, 2024, did not include results for ammonia, cyanide, lead, zinc, arsenic, cadmium, copper, HEM, mercury, molybdenum, and silver.	
41	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(e)(1)	Seidel - Missing pH results for all of 2021, and once in 2022.	4.3 E.
42	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(e)(1)	Hayes - April 2024 sampling results are missing data from cadmium, chromium, copper, cyanide, lead, nickel, silver.	4.3 E.
43	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(h)	ETE Reman - A June 21, 2024, report includes a certification for metal finishers. The IU, however, is not subject to metal finishing standards.	4.3 E.
44	40 C.F.R. § 403.8(f)(2)(iv) and 40 C.F.R. § 403.12(l)	Seidel - The self-monitoring reports do not include certifications by the IU.	4.3 E.
45	40 C.F.R. § 403.8(f)(5) and 40 C.F.R. § 403.12(g)(2)	Sonoco and ETE Reman - The IUs do not notify MMSD of discharge violations within 24 hours of becoming aware of them. MMSD does not cite the IUs for these failures to notify.	4.3 E.
46	40 C.F.R. § 403.8(f)(5) and 40 C.F.R. § 403.12(g)(2)	Hayes - The IU did not notify MMSD within 24 hours of becoming aware of zinc and HEM exceedances that occurred on the following dates: • March 1 to 2, 2022; and • March 16 to 17, 2022. MMSD did not cite the IU for these failures to notify.	4.3 E.
47	40 C.F.R. § 403.8(f)(5) and 40 C.F.R. § 403.12(g)(2)	Sonoco – MMSD issued the following enforcement documents to the IU for exceeding HEM limits on the following dates: • January 2024; • March 15, 2024; and • May 14, 2024. MMSD found these violations after reviewing the IU’s self-monitoring reports. The IU did not (1) repeat HEM sampling and analysis and (2) submit the results of the repeat analysis within 30 days of becoming aware of each violation. MMSD however, did not cite the IU for these violations.	4.3 E.
48	40 C.F.R. § 403.8(f)(5) and 40 C.F.R. § 403.12(g)(2)	Hayes – For each of the cases listed below, the IU’s discharge exceeded pretreatment standards. In addition, the IU did not (1) repeat sampling and analysis and (2) submit the results of the repeat analysis within 30 days of becoming aware of each violation. MMSD however, did not cite the IU for these violations. • A HEM effluent limit exceedance on March 17, 2022;	4.3 E.

		• A monthly average exceedance for zinc in March 2022; • A September 2022 violation reported by Hayes; and • March 30 to 31, 2023, sampling showing zinc and HEM exceedances.	
49	40 C.F.R. § 403.8(f)(5) and 40 C.F.R. § 403.12(j)	Sonoco - Data from February 2021 shows a self-reporting flow of 20,080 gallons; data from August 2022 data shows a flow of 78,910 gallons. There is not documentation in the IU files indicating Sonoco notified MMSD of this substantial change in discharge.	4.3 E.
50	40 C.F.R. § 403.8(f)(2)(iv), 40 C.F.R § 403.8(f)(2)(v)(C), and 40 C.F.R. § 403.12(e)(3)	According to MMSD's 2023 annual report, MMSD implements reduced inspection and/or self-monitoring frequencies for certain "mid-tier" CIUs. However, these CIUs are in significant noncompliance.	6.0