REGION 5
CHICAGO, IL 60604

VIA EMAIL **ECW-15J**

Steven Rochow, Environmental Compliance Manager
Kalamazoo Water Reclamation Plant
1415 Harrison Street
Kalamazoo, Michigan 49007
rochows@kalamazoocity.org

Subject: October 23 to 26, 2023, Pretreatment Compliance Inspection Report for the Kalamazoo Water Reclamation Plant

Dear Mr. Rochow:

Please find enclosed a copy of the inspection report generated as a result of the pretreatment compliance inspection of the Kalamazoo Water Reclamation Plant (Kalamazoo), conducted by the U.S. Environmental Protection Agency from October 23 to 26, 2023.

The purpose of the inspection was to conduct a review of Kalamazoo's pretreatment program implementation. During the inspection, EPA observed several areas of concern; these are listed in the enclosed report. Please provide a written response to the areas of concern identified in the report within 30 days. In your response, please include a description of actions taken to correct any issues documented in the inspection report.

Your response should be submitted electronically to ellens.newton@epa.gov and r5pretreatment@epa.gov. Where it is infeasible to submit electronically, you may mail the information to:

Newton Ellens
Water Enforcement and Compliance Assurance Branch, EPA Region 5
77 W. Jackson Blvd. (ECW-15J)
Chicago, Illinois 60604-3590

If you have any questions or concerns regarding this letter, or the inspection report, please contact Newton Ellens at (312) 353-5562 or at ellens.newton@epa.gov.

Sincerely,

MOLLY SMITH

Digitally signed by MOLLY SMITH
Date: 2024.01.12 13:15:54 -06'00'

Molly Smith
Section 1 Supervisor
Water Enforcement and Compliance Assurance Branch

Enclosure

cc: Pamela Willard
Industrial Pretreatment Program Coordinator
Michigan Department of Environment, Great Lakes, and Energy (via email)

Pretreatment Compliance Inspection: Kalamazoo Water Reclamation Plant, Kalamazoo, Michigan

Control Authority Name and Address
Kalamazoo Water Reclamation Plant
1415 Harrison Street
Kalamazoo, Michigan 49007

Responsible Official
James Baker, Director
Kalamazoo Department of Public Services

Inspection Participants

Kalamazoo Water Reclamation Plant[1]
Steven Rochow, Environmental Compliance Manager
Amber Jane Schneider, WWTP Inspector
Chad Burke, WWTP Inspector

Michigan Department of Environment, Great Lakes and Energy[2]
Terri Shattuck, Senior Environmental Quality Analyst
Pamela Willard, Industrial Pretreatment Program Coordinator
Jeremy Rubio, Environmental Quality Analyst

U.S. Environmental Protection Agency
Jennifer Bush, Environmental Scientist
Joseph Forth, Environmental Engineer
Newton Ellens, Pretreatment Program Manager

Inspector:
Inspector Signature: NEWTON ELLENS Digitally signed by NEWTON ELLENS Date: 2024.01.11 14:19:19 -06'00'
Report Date: _____

Approver Name & Title: MOLLY SMITH
Approver Signature _____ Digitally signed by MOLLY SMITH Date: 2024.01.12 13:16:22 -06'00'
Approval Date: _____

[1] Mr. Rochow was present from October 23 to 26, 2023. Ms. Schneider was present for the October 25, 2023, Kaiser Aluminum Fabricated Products site visit. Mr. Burke was present for the October 26, 2023, Graphic Packaging International site visit.
[2] Ms. Shattuck was present on October 23, 2023, and the afternoon of October 24, 2023. Ms. Willard was present from October 24 to 26, 2023. Mr. Rubio was present on the morning of October 24, October 25 and 26, 2023.

Contents

SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency conducted a Federal Pretreatment Compliance Inspection (PCI) of the Kalamazoo Water Reclamation Plant (Kalamazoo, Kalamazoo WRP, or POTW) from October 23 to 26, 2023. The purpose of the inspection was to evaluate the procedures and implementation of Kalamazoo's pretreatment program. Kalamazoo has a National Pollutant Discharge Elimination System (NPDES) Permit—Permit No. MI0023299 (Permit MI0023299). Part I.C.1.a. of Permit MI0023299 states that Kalamazoo shall implement the Federal Industrial Pretreatment Program (FIPP) approved on October 11, 1985, and any subsequent modifications approved up to the issuance of the permit. EPA's inspection consisted of:

1. Review of requested submittals prior to on-site inspection;
2. Interviews and discussion with Kalamazoo staff;
3. Industrial User (IU) file reviews; and
4. Site visits at two IUs: Kaiser Aluminum and Graphics Packaging International.

On October 23, 2023, at 1:10 p.m. E.S.T., inspectors Newton Ellens, Jennifer Bush, and Joseph Forth arrived at the Kalamazoo WRP, at 1415 Harrison Street, Kalamazoo, Michigan. There, they met Steven Rochow. EPA inspectors presented their credentials and began the inspection.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

Kalamazoo has one wastewater treatment plant. It has a design flow rate of 53.5 million gallons per day (MGD), and an actual flow rate of 26.5 MGD. The treatment processes at the plant are as follows:

1. Primary—Physical settling;
2. Secondary—Activated sludge with powder carbon addition, plus biological nutrient removal (BNR) system;
3. Tertiary—Sand filters, chlorination, and dechlorination.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

Kalamazoo staff stated the following:

A. Pretreatment Program Modification:

Kalamazoo is working on the following program modification activities:

a. Kalamazoo's sewer use ordinance (SUO) was approved by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and Kalamazoo's City Council. Also, Kalamazoo submitted the SUO for public notice.
b. Kalamazoo sent a revised Enforcement Response Plan (ERP) to ERP for EGLE for review.
c. Kalamazoo submitted its local limits to EGLE for review.
d. EGLE recently approved Kalamazoo's Special Alternative Limit (SAL) procedures.[3]
e. Kalamazoo will issue new Industrial wastewater permits (incorporating revised local limits, SALs, and SUO provisions).

[3] Under its pretreatment program, Kalamazoo has the discretion to develop special alternative limits (non-uniform local limits) for industrial users.

f. Kalamazoo is updating its interjurisdictional agreements.

B. Legal Authority:[4]

Kalamazoo has 22 satellite jurisdictions. Kalamazoo's interjurisdictional agreements (IJA) have expired, but the POTW is working with a law firm (Davis and Davis) to update them. Kalamazoo's efforts to implement IJAs have been delayed by rate lawsuits, per- and polyfluoroalkyl substances (PFAS) concerns, and COVID.

Despite Kalamazoo's expired IJAs, Kalamazoo ensures that each satellite jurisdiction legal authority is consistent with its own legal authority. Kalamazoo's Director has met with each satellite jurisdiction on this issue.

C. IU Characterization:

There is a discrepancy between Kalamazoo's SUO and Federal regulations in the significant industrial user (SIU) definition. Kalamazoo's SUO SIU definition is similar to the definition in 40 C.F.R. § 403.3(v); however, Part 28.01.02. of Kalamazoo's SUO includes the following caveat (for IUs that discharge an average of 25,000 gallons per day (gpd) or more of process wastewater, or contributes a process waste stream that makes up 5% or more of the average dry weather hydraulic or organic capacity of the Kalamazoo WRP):

> *The Director may determine that a user that meets the criteria of Subsections (B)(1) or (B)(2) of this definition above is not currently an SIU, if the Director finds that the user has no reasonable potential to adversely affect the operation of the POTW, to violate any pretreatment standard or requirement, or that a Nondomestic User Permit is not required to meet the purposes and objectives of this Chapter. A determination that a user is not an SIU (or that a permit is therefore not required) shall not be binding and may be reversed by the Director at any time based on changed circumstances, new information, or as otherwise determined necessary by the Director to meet the purposes and objectives of this Chapter.*

This provision comes from EGLE regulations (Rule 23, R 323.2302(cc)(iii)).

Kalamazoo searches for SIUs through surveys, communications with satellite jurisdictions, site plan reviews, a community surveillance program, and contacts with local engineering companies. If any of these activities warrant further investigation, then Kalamazoo would follow-up with an inspection of the facility.

Kalamazoo tracks 105 IUs:

- 36 of these IUs are significant (classified as Tier 1);

[4] Pamela Willard stated that Kalamazoo has not updated its legal authority to reflect changes made to the General Pretreatment Regulations under the Pretreatment Streamlining Rule. This is a state issue. EGLE has not updated its pretreatment regulations to reflect the Pretreatment Streamlining Rule changes; therefore, none of the Control Authorities in Michigan has subsequently updated its legal authority.

- 69 of these IUs are “minor” (classified as Tier 2 or Tier 3). Kalamazoo inspects Tier 2 IUs every three years; it inspects Tier 3 IUs every five years.

D. Hauled Wastewater:

Kalamazoo accepts hauled wastewater from two landfills (Autumn Hills Landfill and Northern Oaks Landfill). It also accepts wastewater from a groundwater remediation site (for Allied Paper-now shut down). Kalamazoo issues permits to IUs that haul wastewater. Haulers must give Kalamazoo a 10-minute advance notice before coming on-site. Haulers must discharge their waste at a single, secure location at the Kalamazoo WRP.

E. Application of Pretreatment Standards and Requirements

Kalamazoo’s current local limits were last developed in 1985. Kalamazoo plans to incorporate its proposed local limits into IU permits on January 1, 2024 (pending EGLE review). Kalamazoo uses a uniform allocation for its current local limits. Kalamazoo will use a uniform allocation and a SAL for its proposed limits. Below is a Table 1, document the current and proposed local limit parameters:

Table 1: Current and Proposed Local Limits

Current Local Limit Parameters	**Proposed Local Limits**
Cadmium	Arsenic
Chromium	Cadmium
Copper	Chromium
Lead	Copper
Mercury	Lead
Nickel	Mercury
Zinc	Molybdenum
Total cyanide	Nickel
Total Petroleum Hydrocarbons	Selenium
pH	Silver
Polychlorinated biphenyls (PCBs)	Zinc
Benzene, Toluene, Ethylbenzene, Xylene (BETX)	Lithium
	Acetone
	Benzene
	Ethylbenzene
	Methylene chloride
	Toluene
	Xylene
	Methanol
	Total PCBs
	pH
	Available cyanide

	Hexachlorobenzene
	Total Fats, oils, and grease (FOG)
	Non-polar FOG
	Biochemical oxygen demand (BOD), 5-day
	Total suspended solids (TSS)
	Ammonia
	Total phosphorous

Kalamazoo has identified PFAS as a pollutant of concern beyond those in its current or proposed local limits. Kalamazoo plans to account for PFAS in its next local limit study. The POTW's NPDES permit will expire in 2025. Kalamazoo will submit a technical evaluation of its local limits in its NPDES permit application.

F. Compliance Monitoring:

Generally, Kalamazoo inspects and samples SIUs annually, and requires SIUs to submit self-monitoring reports semi-annually. Certain SIUs with a compliance history (e.g., laundries) have quarterly compliance monitoring frequencies.

Every year, Kalamazoo evaluates each SIU for the need to develop a slug control plan, or the need to modify its slug control plan.

Two metal finishing facilities (Complete Metal Finishing and High-Performance Metal Finishing) haul their wastewater off-site, instead of discharging it to the sewer. Kalamazoo requires these facilities to submit waste manifests semiannually, instead of imposing compliance monitoring requirements for them.

Trace Laboratories (Muskegon, Michigan) conducts metals, cyanide, and organics analysis for Kalamazoo's IU samples. Kalamazoo's internal laboratory conducts compatibles analysis for its IU samples.

In 2022, Pfizer (one of Kalamazoo's IUs) reported that one of its cyanide discharges did not flow through the IU's end-of-process monitoring locations. Kalamazoo issued a Notice of Violation to Pfizer for this monitoring violation and modified the Pfizer IU permit to require monitoring of the unaccounted cyanide discharge.

G. **Enforcement**:

Kalamazoo's definition of significant noncompliance (SNC), written in part 28.17.05 of the SUO, appears similar to the definition written in the Federal regulations (40 C.F.R. § 403.8(f)(2)(viii)). Kalamazoo published four SIUs (Shiloh Industries, D&D Amalgamated Services, Domestic Uniforms Rental Company, and Pharmacia and Upjohn Company, a subsidiary of Pfizer, Inc.) for being in SNC in 2022.

In the first and second quarters of 2023, Kalamazoo has had interference problems caused by Graphic Packaging International (GPI). Specifically, plastics from GPI's discharge has plugged sand filters at the Kalamazoo WRP. Also, Kalamazoo previously exceeded whole effluent toxicity (WET) limits in its NPDES permit. However, the most recent WET test (for the fourth quarter of 2023) shows compliance.

H. Data Management/Public Participation:

If an IU states that information it submits should be designated as confidential, then Kalamazoo will stamp a confidential label on the information and store it in an IU file. If someone from the public submits an information request for files labeled as confidential, then Kalamazoo's attorney would review the file and make a determination whether the files can be released.

Kalamazoo plans to replace its current laboratory data management with Linko in 2024.

Regarding public participation for revisions to Kalamazoo's SUO and local limits: Kalamazoo and EGLE issued a joint public notice of proposed changes to Kalamazoo's SUO and local limits. Additionally, Kalamazoo held a meeting with SIU representatives, to discuss the proposed changes, on May 25, 2023.

Kalamazoo retains pretreatment records for 15 years. Kalamazoo is reviewing its retention schedule, due to storage issues.

I. Resources:

Kalamazoo estimates it uses 11,440 hours per year for pretreatment implementation. Kalamazoo's pretreatment-related resources are shared with other environmental programs; this reduces resource availability for pretreatment activities.

Pretreatment staff stay up to date with program requirements by attending training seminars and participating in Michigan Water Environment Association activities.

J. Environmental Effectiveness/Pollution Prevention

Kalamazoo's historical influent data shows that levels of incoming biochemical oxygen demand (BOD5) and total suspended solids (TSS) have increased due to an expansion of GPI's paperboard mill in 2022.

Kalamazoo has reached out to 200 dentists in its sewer shed through its dental office amalgamated program, to encourage compliance with pretreatment requirements.

In addition to mercury, Kalamazoo has minimization programs for PCBs, hexachlorobenzene and PFAS.

Kalamazoo has significantly reduced the amount of Perfluorooctanesulfonic acid (PFOS), a PFAS analyte, in its effluent. It is one of the first POTWs to be reclassified to a lower bin in the EGLE

IPP PFAS classification system, which reduced their required effluent monitoring for PFAS from monthly to quarterly sampling.

SECTION 4.0: FILE REVIEWS

4.1 IU Identification

IU Name	IU Type	Avg total flow (gpd)	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
Aluminum Finishing Company	CIU	4,112	4,012	no	Pamela Willard	40 CFR Part 433: METAL FINISHING POINT SOURCE CATEGORY
Kaiser Aluminum Fabricated Products LLC	CIU	46,827	25,900	yes	Jennifer Bush	40 CFR Part 467: ALUMINUM FORMING POINT SOURCE CATEGORY
Applied Coatings Incorporated	CIU		1,000	no	Joseph Forth	40 CFR Part 433: METAL FINISHING POINT SOURCE CATEGORY
Graphic Packaging International LLC	CIU		1,500	yes	Newton Ellens	40 CFR Part 430: PULP, PAPER, AND PAPERBOARD POINT SOURCE CATEGORY
Domestic Uniform Rental Company	Non-Categorical SIU	52,105	47,789	no	Terri Shattuck	N/A
Bell's Brewery, Inc.	Non-Categorical SIU	175,536	80,863	no	Joseph Forth	N/A
Kalsec, Inc.	Non-Categorical SIU	106,000	4,000	no	Jennifer Bush	N/A
Borroughs Corporation	CIU	23,600	21,500 (8,000 gallons per	no	Pamela Willard	40 CFR Part 433: METAL FINISHING POINT SOURCE CATEGORY

			batch, 4 times a year)			
Zoetis	CIU	8,280		no	Newton Ellens	40 CFR Part 439: PHARMACEUTICAL MANUFACTURING POINT SOURCE CATEGORY

4.2 Facility Information

Aluminum Finishing Company
615 W Ransom Street
Kalamazoo, Michigan 49007

The company conducts light etching of aluminum and anodizing of aluminum, and five loads per year of black dying. The company uses a scrubber with anodizing operation. Final products are small aluminum parts. For wastewater treatment, the company uses ion exchange and pH neutralization. The company has one outfall on the southwest of the building. The company continuously discharges from 9:00 a.m. in the morning, to 3:00 p.m. in the afternoon. The company's sample location is located at the end of the pretreatment effluent tank of the pH neutralization system.

Kaiser Aluminum Fabricated Products LLC
5205 Kaiser Drive
Kalamazoo, Michigan 49048

The Kaiser Kalamazoo facility is a secondary aluminum processing and distribution facility. Clean charge and painted scrap are received by truck or rail car. The clean charge is sent to the melt furnace, along with various alloys, to produce aluminum billets and extrusions for customers and other Kaiser facilities. The processing equipment includes: the melt, hold, and homogenizing furnaces, 4-ton and 6-ton extrusion presses, five aging ovens, two billet heaters, cutoff saws, QC-laboratory, fabrication cut to length saws with deburring units, truck snow removing station, dross storage and handling area, hot and cold bag house air emissions control units, hydrogen scrubber, billet ultrasonic water tank, soft water and RO conditioning system, three cooling towers with a chemical treatment system, EAF/Hoffman waste water filtration system for removing solids and oils for the waste water prior to discharging to the WWTP. A caustic storage and cleaning system is used to clean used dies from the extrusion presses. The primary raw materials are various types of aluminum scrap and alloys like copper, magnesium, zinc, chromium, silicon, manganese, iron, and titanium. There is one outfall to the sewer. This is an eight-inch sewer line that runs through the east side of the facility, then north, where it ties into the Midlinks main sewer line. The aluminum processing water has a continuous discharge. The R.O. system, water softeners, and truck wash station discharges are intermittent.

Applied Coatings Incorporated
5260 Lovers Lane
Portage, Michigan 49002

Applied Coatings Incorporated's process involves the powder coating of metal parts (primarily steel, aluminum). The facility begins by cleaning the parts prior to coating. The cleaning process uses Phos Seal and cleaner 440 to clean the parts. After the parts have been cleaned, powder coating is applied and then cured onto the parts. The coating utilized by the facility is called Paint Lok 555.

Graphic Packaging International LLC
1500 N. Pitcher St.
Kalamazoo, Michigan 49007

The facility produces coated recycle board from two paper machines, as well as wax coated/polyethylene extruded board. Primary raw materials include water, recycled fiber, clay latex titanium dioxide, and wax polyethylene. The powerhouse provides steam and electricity for onsite use. The powerhouse utilizes a reverse osmosis system to conditions boiler feed water. Operations are supported by numerous air compressors. The K1 and K3 paper machines utilize small water scrubbers on their starch cookers.

Domestic Uniform Rental Company
3401 Covington Road
Kalamazoo, Michigan 49002

The company is a commercial/industrial laundry for uniforms, linens, towels, shop rags and floor mats. The company also rents uniforms, floor mats, etc.

Bell's Brewery, Inc.
8938 Krum Ave
Galesburg, Michigan 49053

The beer brewing processes consist of brewing, fermentation, a 200-barrel line (one barrel contains 31 gallons) and a 50-barrel line. Each line is comprised of the same equipment. Product not fit for sale is sent to the crusher, which destroys bottles and cans for recycling. Waste product is sent to the pretreatment facility. There are also two boilers which are blown down once per day.

Kalsec, Inc.
3713 West Main Street
Kalamazoo, Michigan 49006

Kalsec produces natural colors, natural flavor extracts, antioxidants, hop extracts, and nutritional ingredients for the food, beverage, and pharmaceutical industries. Kalsec products, derived from natural herbs, spices, vegetable and hops, are translated into liquids. The process includes grinding, extraction, hops processing, and finishing. Treatment devices or processes used are grease or oil

separation, neutralization/pH correction, and spill protection. There is one outfall to the sewer system. The facility discharges batch discharges two times per day with an average of 2,000 gallons per batch. The percent of total discharge changes on a daily basis. However, the lab has a continuous discharge.

Borroughs Corporation
3002 North Burdick Street
Kalamazoo, Michigan 49004

The company conducts shearing, punching, forming, welding, phosphate cleaning, painting, finishing. The final products are industrial shelving, automotive work stations, storage products, and library components. The company uses pH neutralization for wastewater treatment. The company has two outfalls; one is for process wastewater. Finally, the company has continuously and batch discharges.

Zoetis
7725 Portage Road
Portage, Michigan 49002

The facility conducts pharmaceutical formulation and packaging.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism Review

Statement of Non-transferability

The IU permits require each IU to notify Kalamazoo within seven days of documenting the transfer of the permit to the new owner. This would preclude the requirement to notify the POTW prior to the transfer.

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

Kaiser Aluminum Fabricated Products LLC – The IU permit does not include a description of the process required for seeking a monitoring waiver for pollutants not present nor not expected to be present.

Sampling frequency

Graphic Packaging International LLC and Zoetis - The IU permit does not require monitoring for local limit pollutants. In addition, Kalamazoo stated that it does not monitor local limit pollutants in lieu of the IU.

Sampling locations/discharge points

Aluminum Finishing Company – The IU permit cites a designated sample location ("AFC") - effluent tank of pH neutralization system. There is a footnote in the IU permit that states wastewater flowing through location AFC is both an end-of-process and an end-of-pipe monitoring location. The inspection reports, however, cite two monitoring locations: an end-of process location (the influent to a neutralization pit, and an end-of-pipe location (the effluent from the neutralization pit) for pH and total petroleum hydrocarbons monitoring.

Sample types (grab or composite)

Each IU permit states, "At a minimum, samples shall be collected at least as frequently as specified in Part III (A) for all pollutants listed. For pollutants with a "grab" sample technique indicated, a minimum of four grab samples must be used. All other samples must be 24- hour flow-proportional composite samples where feasible. If flow-proportional compositing is infeasible, samples may be obtained through time proportional composite sampling techniques." Each IU permit does not define whether flow-proportional or time-proportional composite sample requirements apply to the IU on a case-by-case basis.

Notification of bypasses and upsets

Each IU permit does not require the IU to give prior notice to Kalamazoo of the need for a bypass, at least 10 days in advance (if possible) of the need for the bypass. Also, bypass notification requirements in IU permits, and upset notification requirements in CIU permits do not require each IU to report:

- The duration of event, including exact dates and times;
- If the event has not been corrected, the anticipated time it is expected to continue; and
- Steps taken to reduce and eliminate the event.

Notification of significant change in discharge

Each IU permit only requires the IU to notify the POTW about any substantial change in its discharge within five working days of the change, instead of requiring advance notification.

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

Aluminum Finishing Company, Graphic Packaging International LLC, Borroughs Corporation, and Zoetis – for each IU permit:

- The slug discharge control plan requirement includes the term "if applicable." It is not clear whether the IU is required to have a slug discharge control plan; and
- The IU is required to submit a slug discharge control plan. The required date of submittal date, however, is "on file;" it is not specified in the permit.

B. Application of IU Pretreatment Standards:

Calculation and application of categorical standards

Kaiser Aluminum Fabricated Products LLC - It is not clear how Kalamazoo calculated the production-based standards under 40 C.F.R. § 467.36. The categorical limits (calculated using production and flow rate data) do not match the IU permit limits. For example, Kalamazoo calculated an 8,222 µg/l categorical daily maximum limit for chromium. The local limit for chromium is 4,900 µg/L. However, the IU permit includes a categorical daily maximum limit of 3,649 ug/l.

Application of Best Management Practices

Aluminum Finishing Company and Borroughs Corporation - The IU permit requires monitoring for TTOs and does not include an approval for the IU to use a TOMP. However, the IU's self-monitoring reports certify that no TTOs are discharged, as opposed to including TTO analytical results, and the IU file includes a TOMP.

C. CA Compliance Monitoring

Documentation of sampling activities

Aluminum Finishing Company – Each chain of custody form associated with sample analysis reports does not include the sampler's name.

Analysis for all regulated parameters

Zoetis - The analytical results for samples collected on March 10, 2022, do not include results for any categorical pollutant parameters under 40 C.F.R. Part 439.

Appropriate sampling techniques and analytical methods (40 CFR Part 136)

Graphic Packaging International LLC - A chain of custody form (for samples received on January 6, 2023) does not indicate whether a 24-hour composite sample for metals was a time-composite or a flow composite.

Aluminum Finishing Company - CA analyzed for methanol and the analysis method, EPA 8015B, is not an approved 40 CFR 136 method.

D. CA Enforcement Activities

Identification of discharge violations

Kalsec, Inc. – POTW inspection reports usually include a list of effluent limit violations for the past three years. However, the 2023 inspection report does not include documentation of a December 13, 2022, pH excursion. The POTW did not cite the IU for an October 1, 2020, pH excursion (12.8 S.U. for 108 minutes).

Identification of monitoring/reporting violations

Aluminum Finishing Company – The IU permit states, "Self-monitoring reports shall be submitted Semi-Annually. Reports for each period (January – June and July – December) shall be due on the tenth of the month following the period." However, the POTW did not cite the IU for the following late submittals:

- A self-monitoring report, due on July 10, 2022, was submitted on July 11, 2023; and
- A self-monitoring report, due on July 10, 2021, was submitted on July 12, 2021.

Kalsec, Inc. - The IU does not provide full readings/analysis information for the pH monthly reports. Each monthly self-monitoring report includes a note stating "See M3 notes." However, each report does not include pH data. The POTW did not cite the IU for these reporting violations.

Adherence to approved ERP

Kalsec, Inc. - The ERP lists continuing violations of discharge limits as escalating above a Notice of Violation (NOV). From 2020 to 2022, the IU had 14 violations of pH limits; the POTW has only issued NOVs in response to these violations.

Kalsec, Inc. – Under a pH exemption requirements in the permit, no individual excursion from the pH range (5.0 to 12.5) shall exceed 60 minutes. The POTW, however, did not escalate enforcement beyond issuing an NOV for the following successive pH excursions:

- A September 2020 report indicated a pH excursion of 12.9 for 90 minutes.
- An October 2020 report indicated a pH excursion of 12.8 for 105 minutes.

E. IU Self-Monitoring

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

Aluminum Finishing Company – The chain of custody forms indicate that composite samples were taken, but they do not indicate what type of composite sample was taken (flow-proportional or time-proportional).

Domestic Uniform Rental Company – Each self-monitoring lab report included incomplete laboratory method numbers; each report did not provide the revision numbers and method year.

Borroughs Corporation - The August 13, 2021, sampling event chain of custody is missing the sampler's name. Also, the report does not indicate what type of composite sample was taken (flow-proportional or time-proportional).

Zoetis - A sample analysis report (for a sample collected on May 26, 2023) indicates that the lab used EPA Method 624.1 for methylene chloride analysis. Method 624.1 is not a Part 136 Method for methylene chloride.

Periodic self-monitoring reports submitted by IU

Kalsec, Inc. - The self-monitoring reports submitted by the IU do not include all pH results. The reports are only provided a summary showing whether there is an excursion above or below the permit limits, but not the actual readings.

IU signatory/certification of reports

Aluminum Finishing Company - The July 2023, July 2022, July 2021, and December 2020 SMRs do not have a wet signature, only a photocopy of the signature. The December 2022 TOMP certification statement signature is also a photocopy.

Applied Coatings Incorporated – The original wet signature documents were not in facility file; the documents kept in the facility file are copies of the original signed documents.

Kalsec, Inc. – Each self-monitoring report does not include a certification statement.

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

Graphic Packaging International LLC - According to correspondence, the City notifies GPI of plastic discharges that clog the WWTP's tertiary filters (not vice versa).

Kalsec, Inc. - The IU only reports pH excursions in monthly self-monitoring reports. There is no documentation that the IU notifies the POTW of pH excursions immediately.

IU submission/implementation of slug discharge control plan

Kaiser Aluminum Fabricated Products LLC – A slug plan was not in the files. However, it is noted in POTW inspection reports that the IU's slug plan was updated in 2021.

Kalsec, Inc. - The IU has an SPCC/PIPP. However, the plan is not called a slug plan.

Slug discharge control plan contains procedures for immediately notifying the POTW of slug discharges

Graphic Packaging International LLC - The GPI slug discharge control plan requires GPI to notify the City within one hour of becoming aware of a slug loading, instead of requiring immediate notification.

Kalsec, Inc. - The IU has an SPCC/PIPP in place, but it does not require notification of the POTW of slug discharges.

Notification by IU of significant changes in discharge

Kaiser Aluminum Fabricated Products LLC – The IU file does not include documentation/notification of significant changes in production (~800,000 lbs of aluminum decreased to ~400,000 lbs of aluminum).

SECTION 5.0: KALAMAZOO WRP PLANT TOUR

On October 25, 2023, at 1:10 p.m. EST, Mr. Rochow gave the EPA and EGLE inspectors a tour of the Kalamazoo WRP. Specifically, Mr. Rochow shared the following information and showed EPA and EGLE staff the following during the tour:

- Laboratory
    - Kalamazoo staff conduct testing for compatible pollutants (BOD, COD, TSS, ammonia, and phosphorous) in the laboratory.
    - Kalamazoo uses an outside laboratory for metals and cyanide testing.
- Headworks
    - The Kalamazoo WRP has an average daily flow of 26 to 28 MGD.
    - Kalamazoo uses an odor control system at the headworks. Kalamazoo staff stated that it spent $3 million on odor control, because of complaints about odors from Kalamazoo WRP and Graphic Packaging.
    - Five interceptors feed into two separate wet well systems. The two systems allow Kalamazoo staff to work on one wet well while the other keeps operating, or to use both systems for large flow rates.
    - Kalamazoo uses a flow-proportional sampler at an influent channel.
    - Twenty to 25% of the influent flow is industrial flow.
- Grit chamber
    - The grit chamber is used to separate inorganic materials.
    - Kalamazoo ships solids from the grit chamber to Zeland Landfill; Kalamazoo landfills. Kalamazoo ships about 230 wet tons daily.
- Fine screens building (Attachment I, Photo 1)
    - At time of walk through, plastic pieces were on the screens and floor; Kalamazoo staff said that Graphic Packaging is the source of the plastic.

- Primary settling
    - Kalamazoo has six primary settling tanks; five of the tanks were in service at time of tour.
    - The tanks are parallel settling tanks; rotating arms skim sludge from the bottom of each tank.
    - Flow is evenly split between the five tanks.
    - 4,500 pounds of carbon is added daily.
- Aeration basins (not viewed because of time constraints)
    - There are nine aeration basins; Kalamazoo typically uses seven of these tanks.
    - The plant is phosphorous deficient; Kalamazoo adds phosphorous to the process.

Additional information

- Kalamazoo has two backup generators.

The Kalamazoo WRP plant tour ended at 1:41 p.m. EST.

On October 26, 2023, at 11:00 a.m. EST, Mr. Rochow led the inspectors to see Kalamazoo WRP's sand filters and outfall (Attachment I, Photos 18 to 34).

SECTION 6.0: INDUSTRIAL USER SITE VISITS

Kaiser Aluminum
5205 Kaiser Dr.
Kalamazoo, MI 49048

Date of site visit: October 25, 2023

Inspection Participants:

Kaiser Aluminum Common Alloy Plant:
Anders Lairet-Sorenson, Plant Manager
Aimee Macnowski, Quality Manager

Kalamazoo WWTP
Steve Rochow, Environmental Compliance Manager
Amber Jane Schneider, WWTP Inspector

EPA
Newton Ellens, Pretreatment Program Manager
Jennifer Bush, Environmental Scientist
Joseph Forth, Environmental Engineer

EGLE

Pam Willard, Industrial Pretreatment Program Coordinator
Jeremy Rubio, NPDES Compliance Staff

EPA, EGLE, and Kalamazoo WWTO arrived at Kaiser Aluminum Common Alloy Plant (Kaiser Aluminum or Kaiser Facility) at approximately 2:02 p.m. EST and were met at the front by Anders Lairet-Sorensen (Plant Manager) and Aimee Macnowski (Quality Manager). EPA staff showed Kaiser Aluminum staff their credentials and began the Opening Conference. Kalamazoo WWTP took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, EGLE, and Kalamazoo WWTP by Kaiser Aluminum staff:

- <u>General Plant Information:</u>
  - There are approximately 185 employees onsite.
  - Employees are broken up into two groups. Shifts are on a rotation depending on which group the employee works in. For example, Group 1 will work 4 days on, 3 days off, then the following week working 3 days on, 4 days off. Meanwhile, Group 2 will start with 3 days on, 4 days off, then the following week work 3 days off, 4 days on. Kaiser Aluminum refers to Wednesday as the "swing" day.
  - Shifts are 7 days per week. The first shift is scheduled at 6:00 a.m. – 6:00 p.m., and second shift is 6:00 p.m. – 6:00 a.m.
  - Voluntarily overtime is typically approved by Kaiser Aluminum management, if requested by the employee.
  - The Kaiser Facility is shut down twice a year for maintenance.
  - The production rate is estimated at approximately 400,000 pounds of aluminum per year.
  - Scrap metal comes into the Kaiser Facility via truck during day shift only Monday – Friday.
  - The scrap metal is melted down and made into rods.
  - Kaiser Aluminum ships final products nationally, but primarily in the area (Midwest). The customers are mainly distributors (i.e., warehouses that sell aluminum).
  - The Kaiser Facility does not discharge greater than 25,000 gallons per day.
  - The Kaiser Facility submitted their permit renewal on September 20, 2023.
  - Kaiser Aluminum is located in a business complex called Midlink. Midlink provides water for usage to Kaiser Aluminum.
  - The truck wash area is only used in the winter for snow/ice removal.
  - Kaiser Aluminum began in 2010.
  - Kaiser Aluminum is regulated under 40 CFR 467.36, as a new source.
- Manufacturing Process:
  - Kaiser Aluminum is a custom aluminum extrusions and secondary smelting facility.
  - Kaiser Aluminum receives scrap metals, which are melted down and formed into rods, with the size and shape dependent on customer needs.
  - Final products are solid, there are no holes in the aluminum.
  - The scrap metal starts by going through the molten melting process.

    - The product after the molten melting process is referred to as cast aluminum. The cast aluminum is squeezed through the extrusion press. The cast aluminum rods range from 2,000 – 4,000 pounds each.
    - After extrusion, the cast aluminum is cooled in a quench, or a water bath. This is reused for weeks at a time and only discharged in batches as needed.
    - There are no floor drains on in the Kaiser Facility manufacturing area.
    - Midlink provides the water intake information, but Kaiser Aluminum monitors the water discharged. Flow is measured at the end of weir #1 at the of the process. This is because other Midlink facilities discharge and could be combined with Kaiser Aluminum at the end of pipe.
- Pretreatment:
    - The contact cooling water, quench water, and floor sweeper machine wastewater are collected in the equalization tank. This tank is approximately 3,000 gallons.
    - The pretreatment area onsite is used for oils and some solids.
    - The pretreatment area includes the EAF. The EAF is a kidney loop which pulls 8-10 gallons of water through the hot well, suspends solids, and the water is sent back to the hot well. The hot well is sent through the weir for discharge.
    - Previously the solids were removed with a skimmer in the EAF, but the skimmer does not work anymore.
    - Kaiser Aluminum has recently added a filtration system. The wastewater onsite is currently running through the filtration system and the EAF. With both the filtration and EAF system online, the process water is fed through to the filtration system and the EAF at the same time.
    - Eventually the EAF will be removed, and the water will just go through the filtration system. However, the filtration system had issues running properly when it was first installed.
    - Kaiser Aluminum had not told the WWTP of the filtration system prior to the IU site inspection.
    - The pretreatment area has a 200 gallon per minute capacity.
    - The EAF water is only discharged when the water gets to 2200 for conductivity, or the pH is at 7.9 – 8.1.
    - There is always a small amount of water being discharged due to the valve not able to be completely closed. This ranges from 1.7 – 2.6 gallons per minute.
    - When batch discharges of the EAF occur, it is 15 – 30 gallons per minute.
    - There are two soft water conditioners on site near the EAF system. When these are discharged, this is the main source of the Kaiser Facility discharge.
    - When the softening conditioners discharge, it is over 100 gallons per minute.
    - There is not specific pretreatment staff, but Kaiser Aluminum has an EHS manager and other staff in charge of pretreatment.
- Waste Generation:
    - Multiple waste streams are discharged through the weir, including rainwater from dyke areas and the cooling tower blowdown.
    - Main chemical onsite is caustic oil, which is used to clean the dyes. The caustic is beneficially reused through U.S. Ecology.

    - Oils are on site for equipment, but there are no other chemicals onsite.
    - The only non-treated wastewater that is sent to the sanitary collection system is RO water and domestic waste.
- Wastewater Sampling:
    - Pace Laboratory collects samples weekly of internal water use, not discharged water.
    - The weir (referred to as weir #1) has three levels prior to discharge to the sanitary system.
    - The Kaiser Facility collects samples from the upper level of the weir for the IU self-monitoring. The WWTP collects samples from the lower level of the weir for compliance monitoring.
    - Pace Laboratory collects semi-annual sampling for the self-monitoring submitted to Kalamazoo WWTP.

Plant Walk Through (Attachment I, Photos 2 to 5)

Kaiser Aluminum staff showed EPA inspectors, EGLE, and Kalamazoo WWTP staff the following during the plant walk through:

- Beginning product (scrap metal)
- Extrusion Area
- Quench Area
- EAF System
- Weir #1
- Final products

Records Review

During the opening conference Kalamazoo WWTP requested documents as part of the WWTP inspection. Documents requested by the WWTP included the final SPCC/PIPP for Kaiser Aluminum. However, this document is still in draft form and not final.

Closing Conference

EPA, EGLE, and Kalamazoo WWTP staff completed the site walk through at 4:22 p.m. EST. A closing conference was held with EPA, EGLE, Kalamazoo, and Kaiser Aluminum Staff. David Paul, the Corporate Senior Environmental Scientist for Kaiser Aluminum joined the closing conference via Microsoft Teams call. The close conference ended at 4:35 p.m. EDT.

Graphics Packaging International
1500 North Pitcher Street.
Kalamazoo, Michigan 49007

Date of site visit: October 26, 2023

Inspection Participants:

Graphics Packaging International:
Scott LeBeau, Vice President of Recycled Mill Division
Chris O'Quinn, Stock Prep Superintendent
Steven Smock, Environmental Manager

Kalamazoo WWTP
Steve Rochow, Environmental Compliance Manager
Chad Burke, WWTP Inspector

EPA
Newton Ellens, Pretreatment Program Manager
Jennifer Bush, Environmental Scientist
Joseph Forth, Environmental Engineer

EGLE
Pam Willard, Industrial Pretreatment Program Coordinator
Jeremy Rubio, NPDES Compliance Staff

EPA, EGLE, and Kalamazoo WWTP staff arrived at Graphics Packaging International (GPI or GPI Facility) at approximately 8:32 a.m. EDT and were met at the front by Scott LeBeau (Vice President of Recycled Mill Division). EPA staff showed GPI staff their credentials and began the Opening Conference. Kalamazoo WWTP took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, EGLE, and Kalamazoo WWTP by GPI staff:

- General Plant Information:
  - There are approximately 470 employees onsite.
  - The GPI Facility is open 24 hours a day, 7 days per week with 4 shifts. However, GPI is currently looking to change these shifts to two 12-hour shifts.
  - GPI completed the annual shut down in mid-September. This shut down happens annually for a week to conduct maintenance. Kalamazoo WWTP is notified prior to the shutdown each year.
  - New updates at GPI started in 2021. GPI estimates approximately 700 million dollars have gone into the plant updates.
  - Most recently, GPI completed a rebuild of the screen front of the wet well.
  - Kalamazoo WWTP has worked with Graphics Packaging International in the last 2-3 years due to the amount of plastics being received at the WWTP.
  - Kalamazoo WWTP has seen an increase in plastics in the wastewater received from GPI since April 2022. GPI noted this is around the time when K2, the newest machine on site went into service at the facility.
  - "K2" is a new line at GPI that is estimated to have doubled the operations on site.

    - There is a show case hearing meeting planned for next month (November 2023) for the WWTP and GPI to discuss next steps.
    - In early 2023, the discharge at GPI to the WWTP increased from 0.8 MGD to 2.2 MGD.
    - GPI has expressed concern over the upcoming new permit limits being issued in 2024 from Kalamazoo WWTP.
    - Kalamazoo WWTP reviewed the last three months of screen cleaning at the WWTP. For comparison, in August, over 43% of days the WWTP had to clean over 60% of screens. This month, after the shutdown for maintenance at GPI, 17% of days the WWTP had to complete screen cleaning. GPI believes the rebuild of the screens in front of their wet well is why the WWTP has had a decrease in the screen cleanings.
- Manufacturing Process:
    - Graphics Packaging International is a paper mill which creates recycled packaging.
    - GPI receives shipments of recycled paper materials by the pound from Chicago, Detroit, and Meijer store locations in Southwest Michigan.
    - All shipments go through a sorter prior to arriving at GPI, but there are always unusable materials left in the shipments. As part of this process, GPI has to pick out "rejects" of the paper being recycled. This can include pieces with plastics (bubble wrap, ice bags, plastic envelopes, etc.), garbage, or certain paper grades that cannot be used.
    - Paper products are divided up by category. Categories include top liner, news, box, OCC, OC2.
    - The process begins with a bale knife to break the compressed boxes as they are fed into the process line.
    - Onsite there are 5 different pulpers and stock lines, each with a constant feed of water entering the equipment.
    - The Pulper is the first stage of cleaning of the materials. Skimmers will remove bigger pieces and remove glass, staples, sand, etc. These items are dropped out of the mixture by gravity from high vortex.
    - The next step is a series of cleaning to do additional grit and screening, with each cleaning stage allowing smaller and smaller materials.
    - In the Primary Stage, anything larger than ½ inch cannot move through the pulpers.
    - The lightweight cleaning stage removes tapes, glues, etc.
    - After screening and cleaning, the rejects get pulled and dewatered and recycled again into the internal water loop.
    - The floor drains all get pumped down and collect in the sub pit. The sub pit screens the water going into the pit, then has 2 pumps that lift the water out to be put back in the pulper and reused in the process. The screen in the sub pit is cleaned out about once a day by GPI staff. This is called the U-drain sub screen. At the time of the walk through, the screen material showed overflow on the ground. GPI noted this overflow is cleaned and hauled off site by Clean Earth.
    - The dewatered waste from the screening area is sent to the DAF clarifier. All water from the DAF clarifier is reused internally, this is not discharged to the WWTP.
    - The DAF allows for 1,000 gpm of clarification onsite before it is reused.
    - The overflow that isn't needed in the processes (excess recycled water) is what is discharged to the WWTP.

    - K1, K2, and K3 excess recycled water is piped across the street via to the filter plant for treatment and clarification before being discharged to Kalamazoo WWTP. Design capacity of the filter plant clarifier is 7.5 MGD.
    - During the process, the recycled material becomes a liquid slurry. This is thickened from 1% solids to about 10% solids. The water is taken back out to create the paper pulp. A mechanical and hydrogen bond is utilized for the paper fibers to stick together and create paper sheets. Coating is completed on site as well.
    - Customers include Kellogg's, General Mills, pasta companies, or customers who make boxes for dry products.
- Pretreatment:
    - The excess water is classified as overflow by GPI staff. This is not sent to the filter plant on site at any certain time or water quality.
    - All water onsite is sent through the DAF clarifier and sent back into the process to be reused. If it is not needed in the process, that is when it is discharged to the filter plant.
    - At the clarifier in the filter plant, 75% of the water is sent back and recycled from the east side of the clarifier. The other 25% of the water in the clarifier is discharged to Kalamazoo WWTP through the west side of the clarifier.
    - At the time of the site walk through, there are visible small pieces of plastic moving through the v-notches of the clarifier on the west side that is discharged to the Kalamazoo WWTP.
    - GPI noted the clarifiers were cleaned out 3 weeks ago during the annual shutdown. At the time of the site walk through, plastic build up is evident.
- Waste Generation:
    - Plastics or "reject" materials are hauled off site by Clean Earth.
    - In the two wet wells, Clean Earth uses a vac-truck to remove the screened-out plastics.
    - Clean Earth hauls waste from the GPI site two times per week.
    - Eight bins of plastic waste are hauled off per day.

Wastewater Sampling:

- The sampling location is located at the point of discharge to the Kalamazoo WWTP, on the west side of the clarifier.
- Self-monitoring is completed on site by environmental staff of Graphics Packaging International.
- There is a sampling shed near the discharge location that is owned by the Kalamazoo WWTP. The sampling shed includes a refrigerator and a flow meter.
- GPI has discharges continuously to the Kalamazoo WWTP.

Plant Walk Through (Attachment I, Photos 6 to 17)

Graphics Packaging International staff showed EPA inspectors, EGLE, and Kalamazoo WWTP staff the following during the plant walk through:

- Beginning products
    - Recycled materials from residences, box stores, etc.
- Warehouse floor

    - Pulper
    - Extraction
    - De-trash
    - High Density cleaning
    - Coarse Screening
    - Light Weight Screening
    - Thickener
    - Vacuum
    - Press
- DAF Clarifier
- Filter Plant (located across the street from the warehouse)
- Solids Handling Building

Records Review

During the opening conference Kalamazoo requested documents as part of the WWTP inspection. Documents requested include updated schematics and flow diagrams with the new items added.

Closing Conference

EPA, EGLE, and Kalamazoo WWTP staff completed the site walk through at 10:55 a.m. EST. No closing conference was held at Graphics Packaging International.

SECTION 7.0: SUMMARY OF FINDINGS

A. Areas of Concern

40 C.F.R. Part	File Reviews	Report Section
40 C.F.R. § 403.8(f)(1)(iii)(B)(2)	The IU permits require each IU to notify Kalamazoo within seven days of documenting the transfer of the permit to the new owner. This would preclude the requirement to notify the POTW prior to the transfer.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Kaiser Aluminum Fabricated Products LLC – The IU permit does not include a description of the process required for seeking a monitoring waiver for pollutants not present, nor not expected to be present.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Graphic Packaging International LLC and Zoetis--The IU permit does not require monitoring for local limit pollutants. In addition, Kalamazoo stated that it does not monitor local limit pollutants in lieu of the IU.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Aluminum Finishing Company - The permit cites a designated sample location (“AFC”) - effluent tank of pH neutralization system. There is a footnote in the permit that states wastewater flowing through location AFC is both an end-of-process and an end-of-pipe monitoring location. The inspection reports cite two monitoring locations: an end-of process	4.3 A.

	location (the influent to a neutralization pit, and an end-of-pipe location (the effluent from the neutralization pit) for pH and total petroleum hydrocarbons monitoring.	
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Each IU permit states, "At a minimum, samples shall be collected at least as frequently as specified in Part III (A) for all pollutants listed. For pollutants with a "grab" sample technique indicated, a minimum of four grab samples must be used. All other samples must be 24- hour flow-proportional composite samples where feasible. If flow-proportional compositing is infeasible, samples may be obtained through time proportional composite sampling techniques." Each IU permit does not define whether flow-proportional or time-proportional composite sample requirements apply to the IU on a case-by-case basis.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Each IU permit does not require the IU to give prior notice to Kalamazoo of the need for a bypass, at least 10 days in advance (if possible) of the need for the bypass. Also, bypass notification requirements in IU permits, and upset notification requirements in CIU permits do not require each IU to report: • The duration of event, including exact dates and times; • If the event has not been corrected, the anticipated time it is expected to continue; and • Steps taken to reduce and eliminate the event.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Each IU permit only requires the IU to notify the POTW about any substantial change in its discharge within five working days of the change, instead of requiring advance notification.	4.3 A.
40 C.F.R. § 403.8(f)(1)(iii)(B)(6)	Aluminum Finishing Company, Graphic Packaging International LLC, Borroughs Corporation, and Zoetis – For each IU permit: • The slug discharge control plan requirement includes the term "if applicable." It is not clear whether the IU is required to have a slug discharge control plan; • The IU is required to submit a slug discharge control plan. The required date of submittal date is listed as "on file" and is not specified in the permit.	4.3 A.
40 C.F.R. § 403.8(f)(2)(iii)	Kaiser Aluminum Fabricated Products LLC - It is not clear how Kalamazoo calculated the production-based standards under 40 C.F.R. § 467.36. The categorical limits (calculated using production and flow rate data) do not match the IU permit limits. For example, Kalamazoo calculated an 8,222 µg/l categorical daily maximum limit for chromium. (The local limit for chromium is 4,900 µg/L.) However, the IU permit includes a categorical daily maximum limit of 3,649 ug/l.	4.3 B.
40 C.F.R. § 403.8(f)(2)(iii)	Aluminum Finishing Company and Borroughs Corporation - The IU permit requires monitoring for TTOs and does not include an approval for the IU to use a TOMP. However, the IU's self-monitoring reports	4.3 B.

	certify that no TTOs are discharged, as opposed to including TTO analytical results, and the IU file includes a TOMP.	
40 C.F.R. § 403.8(f)(2)(vii)	Aluminum Finishing Company – Each chain of custody form associated with sample analysis reports do not include the sampler's name.	4.3 C.
40 C.F.R. § 403.8(f)(2)(v)	Zoetis - The analytical results for samples collected on March 10, 2022, do not include results for any categorical pollutant parameters under 40 C.F.R. Part 439.	4.3 C.
40 C.F.R. § 403.8(f)(2)(vii)	Graphic Packaging International LLC - A chain of custody form (for samples received on January 6, 2023) does not indicate whether a 24-hour composite sample for metals was a time-composite or a flow composite.	4.3 C.
40 C.F.R. § 403.12(g)(5)	Aluminum Finishing Company - CA analyzed for methanol and the analysis method, EPA 8015B, is not an approved 40 CFR 136 method.	4.3 C.
40 C.F.R. § 403.8(f)(5)	Kalsec, Inc. – The POTW did not cite the IU for an October 1, 2020, pH excursion (12.8 S.U. for 108 minutes).	4.3 D.
40 C.F.R. § 403.8(f)(5)	Aluminum Finishing Company – The IU permit states, "Self-monitoring reports shall be submitted Semi-Annually. Reports for each period (January – June and July – December) shall be due on the tenth of the month following the period." However, the POTW did not cite the IU for the following late submittals: • A self-monitoring report, due on July 10, 2022, was submitted on July 11, 2023; and • A self-monitoring report, due on July 10, 2021, was submitted on July 12, 2021.	4.3 D.
40 C.F.R. § 403.8(f)(5)	Kalsec, Inc. - The IU does not provide full readings/analysis information for the pH monthly reports. Each monthly self-monitoring report includes a note stating "See M3 notes." Each report does not include any pH data. The POTW did not cite the IU for these reporting violations.	4.3 D.
40 C.F.R. § 403.8(f)(5)	Kalsec, Inc. - The ERP lists continuing violations of discharge limits as escalating above an NOV. From 2020 to 2022, the IU had 14 violations of pH limits; the POTW has only issued NOVs in response to these violations.	4.3 D.
40 C.F.R. § 403.8(f)(5)	Kalsec, Inc. – Under a pH exemption requirements in the permit, no individual excursion from the pH range (5.0 to 12.5) shall exceed 60 minutes. The POTW did not escalate enforcement beyond issuing an NOV for the following successive pH excursions: • A September 2020 report indicated a pH excursion of 12.9 for 90 minutes. • An October 2020 report indicated a pH excursion of 12.8 for 105 minutes.	4.3 D.

40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(o)	Aluminum Finishing Company – The chain of custody forms indicate that composite samples were taken, but they do not indicate what type of composite sample was taken (flow-proportional or time-proportional).	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(o)	Domestic Uniform Rental Company – Each self-monitoring lab report included incomplete laboratory method numbers; each report did not provide the revision numbers and method year.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(o)	Borroughs Corporation - The August 13, 2021, sampling event chain of custody is missing the sampler's name. Also, the report does not indicate what type of composite sample was taken (flow-proportional or time-proportional).	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(g)(5)	Zoetis - A sample analysis report (for a sample collected on 5/26/23) indicates that the lab used EPA Method 624.1 for methylene chloride analysis. Method 624.1 is not a Part 136 Method for methylene chloride.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(h)	Kalsec, Inc. - The self-monitoring reports submitted by the IU do not include all pH results. The reports are only provided a summary showing whether there is an excursion above or below the permit limits, but not the actual readings.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(l)	Aluminum Finishing Company - The July 2023, July 2022, July 2021, and December 2020 SMRs do not have a wet signature, only a photocopy of the signature. The December 2022 TOMP certification statement signature is also a photocopy.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(l)	Applied Coatings Incorporated – The original wet signature documents were not in facility file; the documents kept in the facility file are copies of the original signed documents.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(l)	Kalsec, Inc. – Each self-monitoring report does not include a certification statement.	4.3 E.

40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(f)	Graphic Packaging International LLC - According to correspondence, The City notifies GPI of plastic discharges that clog the WWTP's tertiary filters (not vice versa).	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(f)	Kalsec, Inc. - The IU only reports pH excursions in monthly self-monitoring reports. There is no documentation that the IU notifies the POTW of pH excursions immediately.	4.3 E.
40 C.F.R. § 403.8(f)(2)(iv)	Kalsec, Inc. - The IU has an SPCC/PIPP. The plan is not called a slug plan.	4.3 E.
40 C.F.R. § 403.8(f)(2)(iv)	Graphic Packaging International LLC - The GPI slug discharge control plan requires GPI to notify the City within one hour of becoming aware of a slug loading, instead of requiring immediate notification.	4.3 E.
40 C.F.R. § 403.8(f)(2)(iv)	Kalsec, Inc. - The IU has an SPCC/PIPP in place, but it does not require notification of the POTW of slug discharges.	4.3 E.
40 C.F.R. § 403.8(f)(2)(vi) 40 C.F.R. § 403.12(j)	Kaiser Aluminum Fabricated Products LLC – The IU file does not include documentation/notification of significant changes in production (~800,000 lbs of aluminum decreased to ~400,000 lbs of aluminum).	4.3 E.

B. Additional Observations

Regulatory Citation	**Site Background & Inspection Observations**	**Report Section**
40 C.F.R § 403.8(f)(1) NPDES Permit No. MI0023299, Part I, Section C.1.c.	Kalamazoo has 22 satellite jurisdictions. Kalamazoo's interjurisdictional agreements (IJA) have expired, but the POTW is working with a law firm (Davis and Davis) to update each. Kalamazoo's efforts to implement IJAs have been delayed by rate lawsuits, per- and polyfluoroalkyl substances (PFAS) concerns, and COVID. Despite Kalamazoo's expired IJAs, Kalamazoo ensures that each satellite jurisdiction legal authority is consistent with its own legal authority. Kalamazoo's Director has met with each satellite jurisdiction on this issue.	3.0 B.

40 C.F.R. § 403.8(f)(2)(vi)	Kaiser Aluminum Fabricated Products LLC – A slug plan was not in the files. However, it is noted in POTW inspection reports that the IU's slug plan was updated in 2021.	4.3 E.