

REPORT OF THE PRETREATMENT COMPLIANCE INSPECTION

The City of Iola
1220 Hwy 54 West
Iola, Kansas 66749

NPDES permit No.: KS099414

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

July 24, 2024

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Pretreatment Compliance Inspection of the Iola Approved Industrial Pretreatment Program (IPP) was conducted on July 24, 2024. To direct the inspection, a checklist was used that evaluates all important elements of the Pretreatment Program. A copy of the checklist is attached to this report (Attachment 1). The inspection consisted of a discussion with the IPP personnel and file review of the IPP's program records, and visits to Russel Stover Candies and Gates Rubber Corporation. Mr. Steve Caspers, with the Kansas Department of Health and Environment (KDHE), Beckett Nichols and Justin Kensinger, with the Environmental Protection Agency, Region 7, were also present for this inspection. This narrative report presents the findings of the inspection.

Participants

City of Iola Industrial Pretreatment Program

- Toby Ross, Water & Wastewater Superintendent toby.ross@cityofiola.com

Russel Stover

- John Carroll, Plant Engineer john.carroll@rstover.com

The Gates Corporation (Gates Rubber)

- Ryan Sanders, Environmental Coordinator
- Karl Tran, Health, Safety, and Environmental Manager

KDHE-Bureau of Water-Industrial Program Section Steve.Caspers@ks.gov

- Steve Caspers, Pretreatment Specialist

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

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS Ahmad.Naji@epa.gov
- Beckett Nichols, Environmental Engineer, ECAD/WB/DWIS Nichols.Beckett@epa.gov
- Justin Kensinger, Pretreatment Coordinator, WD/PWD Kensinger.Justin.R@epa.gov

Facility Description

The city of Iola owns and operates a wastewater treatment system (WWTS) serving a community of 5,400 people and at least three industries. The WWTS is located southwest of the city at 1211 1300 Street. The city operates the system under the Kansas National Pollutant Discharge Elimination System (NPDES) permit number KS099414 that will expire on February 28, 2027.

The WWTS is a wastewater stabilization lagoon system consisting of an aeration equalization tank followed by three wastewater stabilization cells operated in series with 11 solar-power mixers with a total surface area of 99.65 acres at a 5-foot depth. In addition, there is a 6.9-acre covered serpentine polishing cell with an 8-foot depth serpentine flow and plastic cover.

The WWTS has an actual flow of 0.25 million gallon per day (mgd), design daily average flow of 0.819 mgd, a peak dry weather design of 1.638 mgd, and wet weather design of 3.276 mgd. Mr. Toby indicated that due to the dry weather, the lagoon had not discharged. The city does not accept hauled waste. The treated wastewater (effluent) is discharged to the Neosho River.

On December 13, 2023, the city published a Lagoon Condition and Capacity Analysis (Attachment 9). The purpose of the analysis/study was to provide the city with an assessment of the improvements necessary for compliance with the existing five-day Biochemical Oxygen Demand (BOD₅) and final ammonia limits. The study shows that the 2022 average daily flow to the WWTS was 1.04 mgd and 0.83 mgd in 2023, and influent average BOD₅ loading in 2022 was 970 lbs/day and 717 lbs/day in 2023. The study also included data for Total Suspended Solids (TSS), Total Kjeldahl Nitrogen (TKN), and Ammonia (NH₃).

Approximately 10% of the WWTS's flow comes from industrial sources and approximately 50% of that is from the industrial user, Russell Stover Candies alone. Russell Stover Candy sends a flow of approximately 60,000-100,000 gpd with a BOD₅ ranging from 300 lbs/day to 1,200 lbs/day to the treatment facility. Rough calculations indicated that on average, Russel Stover contributes approximately 93 lbs of BOD (Attachment 10). That is approximately 10% of the WWTS loading of 970 lbs.

On August 13 and 14, 2024, Mr. Toby Ross provided me with Russel Stover's self-monitoring data to calculate the BOD₅ loading and compare it to the WWTS influent loading. From this data, it was determined that the WWTS had exceeded the BOD₅ permit limits in the past 12 months (Attachment 8). However, Mr. Ross indicated that none of the exceedances were caused by or contributed by an industry discharge. He added, *"to address the BOD₅ issues, the polishing pond is being used seasonally to avoid spikes in BOD₅ levels."*

According to Mr. Ross, no Sanitary Sewer Overflows occurred in the past 12 months. The sanitary sewer system does have inflow and infiltration (I&I) problems due to its age and degradation of the original construction materials. Maintenance and repair activities are conducted by city staff. Multiple areas of the collection system identified by camera or smoke testing as needing repairs have been relined or replaced. The city has been budgeting \$200,000 per year that is utilized to repair or replace lines to eliminate I&I issues. Staff have also been refurbishing one lift station per year.

Industrial Pretreatment Program Overview

The city of Iola Industrial Pretreatment Program (IPP) was originally approved on July 1, 1987. The city's local limits were originally approved on January 26, 1994. The city recalculated the local limits for the second time and were approved on March 28, 2016, and adopted into the Iola code of ordinances on April 25, 2016, under Section 15-819. According to 40 CFR 122.44(j)(2)(ii), the IPP is required to provide a written technical evaluation of the need to revise (or not to revise) local limits under 40 CFR 403.5(c)(1) following permit issuance or reissuance.

The local limits were adopted as the Maximum Allowable Headworks Loadings (MAHL) and Maximum Allowable Industrial Loadings (MAIL) for the analyzed metal and conventional pollutants based on the wastewater stabilization lagoon system capacity and loading limits.

The BOD limits are based on a design daily average of 3,388 pounds per day and daily maximum of 4,404 pounds per day. Table 1 below lists the local limits for all pollutants of concerns (POC) as included in Section 15-819.

Table 1, Iola's 2016 Local Limits

Pollutant	MAHL lbs/day	MAIL lbs/day
Arsenic, AS, total	0.624	0.608
Cadmium, Cd, total	0.251	0.235
Cyanide, CN	0.855	0.818
Chromium, Cr, total	8.546	8.286
Copper, Cu, total	6.447	6.286
Lead, Pb, total	0.617	0.363
Mercury, Hg, total	0.002	0.001
Molybdenum, Mo, total	1.504	1.4
Nickel, Ni, total	7.254	7.192
Selenium, Se, total	2.884	2.78
Silver, Ag, total	0.036	0.01
Zinc, Zn, total	8.546	7.120

Pollutant	MAHL Avg lbs/day	MAHL Max lbs/day	MAIL Avg lbs/day	MAIL Max lbs/day
Biochemical Oxygen Demand (BOD)	3,388	4,404	2,418	3,434
Total Suspended Solids (TSS)	1626	2436	485	1,298
Total Kjeldahl Nitrogen (TKN)	340	510	152	322

The city recently completed and submitted the influent and effluent sampling data of its lagoon to KDHE and EPA (Attachment 2) to help with calculating local limits. Since the city operates wastewater lagoons, there is no sludge data provided.

The authority to enforce the IPP is listed under Chapter XV (15), Article 8 of the Iola code of ordinances that was originally approved on July 2, 1991. On January 11, 2024, the EPA approved the city's revision to the ordinance that incorporated the required amendments to the

General Pretreatment Regulations [40 CFR: 403.7, 403.8, 403.12, and 403.13] published in the Federal Register on October 14, 2005, known as the Streamlining Rule (Attachment 3).

The ordinance gives the city the authority to implement and enforce the IPP, such as issuing permits for a duration of five years or less; requires the submittal of permit renewal applications prior to the expiration of the permit; and the right to inspect, sample, enforce, and the authority to seek or assess civil or criminal penalties in at least the amount of \$1,000.00 per day for each violation by industrial users of pretreatment standards and requirements pursuant to the requirements of 40 CFR 403.8(f)(1)(vi)(A).

Mr. Ross has been the responsible person for coordinating the Iola IPP, the operation of the wastewater system, Water Treatment Plant, and the Fat, Oil and Grease Program for almost 30 years.

The Iola IPP doesn't have a set frequency to conduct an industrial waste survey. However, the IPP continues to conduct informal industrial surveys and it is part of Iola inter-departmental communication where IPP personnel would know if new entities were planning on connecting to the sanitary sewers. Records indicated that the last formal IWS was completed in 2014. The industrial user regulated community, however, remained consistent over the past several years.

Currently there are three regulated Significant Industrial Users (SIU) all of which are located within the Iola city limits. Two industries are subject to categorical pretreatment standards and Russell Stover Candies is a non-categorical industry. Precision International is subject to the Metal Finishing Pretreatment Standard, Part 433 and Gates Rubber is subject to the Rubber Manufacturing Standard, Part 428 and the Plastics Molding & Forming Standard Part 463. Russell Stover is a significant industrial user and a significant source of organic loading to the city's wastewater treatment system.

The Iola IPP has identified and sent the one-time compliance report (OTCR) to all dental offices in 2017 under the Amalgam rule 40 CFR Part 441. The city used the Kansas Dental Association and the Kansas Dental Board lists of dental offices provided by Mr. Steve Caspers. The IPP continues to send the OTCR to any new dental offices that comes to the city.

Permits

Section 15-824 of the SUO indicates that permits shall be issued for a specified time period, not to exceed five years or less. The user shall apply for permit reissuance a minimum of 90 days prior to the expiration of the user's existing permit. Records indicate that all industries have current permits. Records also indicate that Mr. Ross re-issued all permits on January 1, 2024, with a five-year duration to reflect changes made to the new sewer use ordinance (Attachment 4). This is different from the three-year duration the city used to issue previous permits with (Attachment 5). Overall, permits appeared to contain the necessary elements that should be included in an enforceable permit as required by 40 CFR 403.8(f)(1)(iii).

During my review of permits upon my return to the office, I noticed that permits include the wrong general pretreatment regulation citation for slug load. The permit references 40 CFR 403.8(f)(vi)(B)(V). The correct citation is 40 CFR 403.8(f)(2)(vi).

Inspections

Section 15-809 gives the IPP Coordinator the authority at all reasonable times to enter the premises of an industry for purposes of inspection, sampling, records examination or in the performance of any of their duties. Records indicated that all SIUs were inspected in the past 12 months. Inspections are usually done in the last three months of the year by Mr. Ross using a four-page checklist provided by KDHE in place of the six-page Region 7 Industrial User Inspection Checklist. The current checklist consisted of 54 questions (Attachment 5). Overall, inspection checklists were properly completed.

During my file review, there was no documentation indicating that the IPP Coordinator evaluated IUs for the need for a slug discharge/spill control plans to control slug discharges. The development and implementation of slug discharge/spill control plans is required by Section 15-848 of the SUO and Condition 6 of the industrial permit. During my file review, there was no documentation indicating the IPP Coordinator evaluated slug discharge/spill control plans. The IPP Coordinator must evaluate all submitted plans to ensure that plans confirm with 403.8(f)(2)(vi) requirement.

Steve Caspers, during the September 12, 2023, KDHE PCI indicated that *“The City decided to have all of their SIUs develop and submit Spill Plans. The City had not reviewed all of the Spill Plans in detail, to make sure they were complete. A quick review of Russell Stover's Plan indicated it was fairly complete.”*

In an email from Steve Caspers on August 20, 2024, he indicated that, *“I believe the reason you did not see any documentation in the city files was because I had evaluated the plans. I reviewed the Gates Rubber plan in 2018 and Russell Stover's plan in 2020. I determined they needed to be improved and those changes were made later by these IUs.”* In a later mail Mr. Caspers provide the documentations (Attachment 11).

According to 403.8(f)(2)(vi), if the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges.
- (B) Description of stored chemicals.
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under § 403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

Compliance Monitoring, Self-Monitoring, and Reporting

Section 15-809 of the SUO gives the IPP the right to setup on the user's property such devices as are necessary to conduct sampling and compliance monitoring and/or metering operations. The IPP samples all industries at least annually for all regulated pollutants. The city is capable of sampling with short notices and using analytical methods that conform to 40 CFR Part 136.

Self-monitoring requirements for each industry are listed in their industrial permit as follows:

Russel Stovers Candies is required to monitor monthly for BOD, TSS, and TKN, and daily for pH, and flow. The industry is required to implement best Management Practices (BMP) to prevent excessive oil and grease from entering the city's sewer collection system.

Precision International is required to sample quarterly for parameters listed in 433, pH, oil and grease, and daily for flow. The city allowed the industry to submit a total toxic organics (TTO) certification indicating that they are implementing a Solvent Management Plan (SMP)/Toxic Organics Management Plan (TOMP) in lieu of TTO monitoring.

Gates Rubber Company is required to monitor quarterly for oil and grease, pH, and daily for the flow. The city allowed the industry to submit a TTO certification indicating that they are implementing a SMP/TOMP in lieu of TTO monitoring.

Pursuant to 40 CFR Part 136, Russell Stover is certified by KDHE for pH, as a field laboratory, and all industries are using commercial certified laboratory.

Industries are required to submit semi-annual self-monitoring reports no later than 15 days after the end of the reporting period. Semi-annual reports appeared to be submitted accordingly and included the required certification statements.

Records indicated that *Precision International* submitted the SMP plan with the certification statement. The last plan revision was on June 16, 2024 (Attachment 6).

Enforcement

The ERP was originally approved on January 2, 1991, and was recently revised by the city, and approved by the EPA on January 11, 2024 (Attachment 7). The ERP has the elements required by the 40 CFR 403.8(f)(5).

Records indicated that all industries were in full compliance during the 2022 and 2023 calendar years. Records also indicated that the last notice of violation was issued on February 23, 2022, to Specialties Technologies for exceeding the daily maximum and monthly average limits for lead (Pb) during the second half of 2021. It appeared that Mr. Ross followed the process identified by the ERP.

Site visits to Russel Stover and Gates Rubber

Steve Caspers, Beckett Nichols, Justin Kensinger, Toby Ross and I, traveled to Russel Stover and Gates Rubber facilities to observe the IPP Coordinator conduct an inspection at Gates Rubber and look at the pH monitoring location at Russel Stover. We did not observe any noncompliance issues during the visits.

Mr. Ross was the lead inspector at Gates Rubber. He started the inspection with an opening conference. Then we toured the production areas, chemical storage, and the outfall. At the end, Mr. Ross completed the checklist and conducted an exit meeting. Overall, Mr. Ross conducted

adequate inspection by preparing the checklist, reviewed the industry file, and conducted a thorough inspection.

Data Management

Overall, industrial files have all the necessary documentation as recommended by the Agency checklist. Each file consisted of permit and permit renewal applications, inspection reports, monitoring reports, and correspondence between the IPP Inspector and the industry. Records are well kept by Mr. Ross' office at the Water Treatment Plant and maintained for more than three years and are available for public review. Records are also kept electronically.

Conclusion & Recommendations

Mr. Tobby Ross continues to manage the Iola IPP accordingly. Files and records were readily available during the inspection. Mr. Ross has been overseeing and managing the Iola IPP for almost 30 years. The city should cross-train other qualified staff members on implementing the IPP.

The city's current local limits were approved on March 28, 2016. It has been over five years since the local limits were evaluated and approved. The city completed the collection of the lagoon system influent and effluent sampling data and submitted the data to KDHE and the EPA on August 12, 2024, to help calculate the local limits. The city should complete the evaluation and approval of local limits as a priority task.

The city should revise industrial permits to include the correct Slug Control Plan requirements as cited in 40 CFR 403.8(f)(2)(vi).

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Naji J. Ahmad
Environmental Engineer, WB/DWIS

NICOLE MORAN Digitally signed by
NICOLE MORAN
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Nicole Moran
Section Supervisor, WB/DWIS

Attachments

1. PCI Checklist
2. LL sampling data for local limits
3. SUO
4. Current Permits
5. Inspection Reports and previous permits
6. Precision SMP
7. 2024 ERP
8. DMRs
9. 2023 WWTS study
10. Russel Stover BOD Loading
11. Slug/Spill Plans



PCI

Approved Pretreatment Program

Date(s): **July 24, 2024**

FY 2024

POTW:	CITY OF IOLA			Date of last PCI/Audit:
Address:	1220 Hwy			9/21/2023
	Iola, KS, 66749			NPDES Permit No.:
				KS099414
Contact:	Toby Ross			State Permit No.:
Title:	Water & Wastewater Superintendent			M-NE37-I001
Phone:	620-365-4940			Expiration Date:
Fax:	620-365-4906	e-mail	iolawtr@iolaks.com	2/28/2027

Participants

POTW:	Inspectors:
Toby Ross, Water & Wastewater Superintendent	Naji J. Ahmad, Environmental Engineer, EPA Justin Kensinger, EPA Pretreatment Coordinator Beckett Nicholas, Environmental Engineer, EPA Steve Caspers, Bureau of Water, KDHE
Period covered by this PCI/Audit: 2022 & 2023	

POTW Information

Total for ALL Treatment Plants (MGD)			
Design Daily Ave. 0.819	Actual Daily Ave. 0.25	Design Peak: 1.638 DW/3.276WW	% Industrial Flow: 10%
Number of Plants: Lagoon system	% Combined Sewers: NONE	Type of Treatment at Principal Plant: Three Cell lagoon+ Polishing cell Stabilization lagoon	
Sludge Disposal Method: NONE	Quantity (dry/tons/Y): NA	Receiving Stream: Neosho River	

PART I: PROGRAM BACKGROUND INFORMATION

I.A. Approved Modifications to the Original Program

1.

Date of last NPDES permit modification:	Date of original Program approval:	07/01/1987
03/06/1991	Date NPDES Permit originally modified to require implementation [PTIM] :	1/22/1984

2. Approved Pretreatment Program modifications:

REQUIRED MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
PIRT SUO Revisions	07/02/1991	SUO Revisions with Streamlining Rule	1/11/2024
List of SIUs [403.8(f)(6)]	03/26/1991		
Enforcement Response Plan	01/02/1991	Updating the ERP	1/11/2024
DSS SUO Revisions	07/02/1991		
LOCAL LIMITS	01/26/1994	Local limits	3/28/2016

3. Is the POTW presently working on any program modifications? **YES**

IPP working on collecting data for LL evaluation

4. Does the POTW have any program modifications currently being reviewed by the Approval Authority?
NO

I.B. Approved Program Contents

5. Authority to enforce Pretreatment Standards contained in:

Chapter XV (15). Utilities - Article 8

6. Date enacted or adopted: **Ord. 3099, § 1.2, 7-22-91, Ord. 3459, 4-25-16. Ord.3514 01/12/2023**

7. Approved Control Mechanism:

PERMITS

8. What is the frequency required by the **approved program**/modifications for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	1/Y	1/Y
POTW inspection of:	1/Y	1/Y
SIU self-monitoring:	4/Y	4/Y
SIU reporting:	2/Y	2/Y

9. What types of enforcement options are available through the Approved Program:

Y	Notice of Violation (NOV)
Y	Administrative Order (AO)
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
Y	Fines; at least \$1000/day/violation
Y	Criminal Penalties
Y	Termination of Service

10. COMMENTS:

Section 15-818. Civil/criminal penalties. *“Pursuant to the requirements of 40 CFR 403.8(f)(1)(vi)(A), the city shall have the authority to seek or assess civil or criminal penalties in at least the amount of \$1,000.00 per day for each violation by industrial users of pretreatment standards and requirements. Further, if any person discharges sewage in addition to the penalties provided in this section, the city may recover reasonable attorneys’ fees, court costs, court reporters’ fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article or the orders, rules, regulations and permits issued under this article.”*

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any Pretreatment modifications been made to the Sewer Use Ordinance since the last PCI/Audit that have not been approved by the Approval Authority. **NO. City adopted streamlining Rule on 1/11/2024.**
12. List by name and location any SIUs that discharge to the POTW from outlying jurisdictions.
All within city limits.

Indicate which of the above are not covered by a contract/agreement requiring them to abide by the POTW's legal authority.

13. Does the POTW have the authority to seek in at least a \$1000 per day? [403.8(f)(1)(vi)]
YES Section 15-818.
14. If the POTW has not yet developed an Enforcement Response Plan when does the POTW feel it will complete this requirement? **NA. ERP was last approved on 1/11/2024.**
15. COMMENTS:

II. B. Control Mechanism

16. General Information:

Type:	PERMITS	Issued to Non categorical SIUs? [DSS: 403.8(f)(2)(i)] YES
Duration:	5 YEARS	

17. Do all SIUs have current (unexpired) control mechanisms? {**NOCM**} **YES.**
18. List by name those that do not and indicate which ones have not had a current control mechanism for 180 days or more. {**RNC/SNC**} **NONE.**

II.C. Hauled Wastes

19. Does the POTW accept hauled waste? (If "no," go to question 25) **NO.**
- a. if so describe (include approx. no. of loads per month): **NA**
- b. How does the POTW ensure that it does not accept hazardous waste? **NA**
20. Does the POTW have a control mechanism for regulating waste haulers, and if so describe. **NA**
21. Does the POTW have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
Describe: **NA**

22. Are all applicable Categorical standards and Local Limits applied to IUs whose wastes are hauled to the POTW? **NA**
23. Describe the method used to apply local limits to hauled waste. **NA**

II.D. Industrial User Characterization

25. How often does the POTW update its Industrial Waste Survey (IWS) to identify new SIUs or changes to wastewater discharges? **No set frequency.**
 a. When was the last formal update? **2014.**

26. What is the POTW's current industrial base?

Current	Industrial User Type	Last Reported
2	Categorical SIUs {CIUS}	2
1	Non-Categorical SIUs	
3	Total all SIUs {SIUS}	3

II.E. Local Limits

27. Does the POTW have numerical limits for metals in its NPDES permit? If so list the metals and the limits (or attach list). **NO**
28. Have there been any numerical NPDES permit violations in the last 12 months? **YES. BOD limits.**
The polishing pond is being used seasonally to avoid spikes in BOD levels.
- a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through? **NO**
 1. Was the interference traceable to an industrial user? **NO**
 2. Was action taken that led to elimination within 90 days of the interference or pass through? {SNC} **NO**
 3. Was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? {SNC} If not, why? **NO**
29. How many times per year does the POTW regularly sample its PRINCIPAL plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	0	1	NA
Toxic Organics	0	0	NA
Biomonitoring		0	
TCLP			NA

30. List below the numerical value for the local limits derived by technical analysis. If a technical analysis was performed but the limit not adopted enter DNA in the block. (Values assumed to be mg/l unless otherwise noted). {EVLL} {ADLL} **April 25, 2016. Maximum Allowable Headworks Loadings and the Maximum Allowable Industrial Loadings are listed in the table below as mass limits. Section 15-819.**

POLLUTANT	MAIL Lbs/day	MAIL Lbs/day
Arsenic (Total)	0.624	0.608
Cadmium (Total)	0.251	0.235
Cyanide	0.855	0.818
Chromium (Total)	8.546	8.286
Copper (total)	6.447	6.286
Lead (total)	0.617	0.363
Mercury (Total)	0.002	0.001
Molybdenum (Total)	1.504	1.4
Nickel (Total)	7.254	7.192
Selenium (Total)	2.884	2.78
Silver (Total)	0.036	0.010
Zinc (Total)	8.546	7.120

POLLUTANT	MAHL. Avg (Lbs/day)	MAHL Max (Lbs/day)	MAIL Avg (Lbs/day)	MAHL Max (Lbs/day)
Biochemical Oxygen Demand (BOD)	3388	4404	2418	3434
Total Suspended Solids (TSS)	1626	2436	485	1298
Total Kjeldahl Nitrogen (TKN)	340	510	152	322

31. Are the POTW's BOD and TSS limits technically derived (ie. based on plant capacity)? **YES.**
32. Are BOD and TSS violations treated as violations of technically based local limits? **NA**
33. If there is more than one treatment plant, were the local limits established specifically for each plant?
NA
34. Has the POTW made any changes to its Local Limits which have not been approved, and if so provide details? [403.18] **NO.**
35. Has the POTW granted any Net/Gross allowances under 403.15? **NA**
36. **COMMENTS: The city is currently resampling the plant to collect more representative data in**

order to reevaluate the local limits.

II.F. Standards and Requirements for Industrial Users

37. Does the POTW compare local limits against federal Categorical standards and apply the most stringent standards to Categorical IUs? [403.4] **YES.**
38. Has the POTW notified its IUs of possible RCRA obligations? [40 CFR 403.8(f)(2)] **YES. During inspection.**
39. Does the POTW allow Categorical users to use Solvent Management Plans/certification or surrogate test procedures to meet TTO requirements? **YES**

II.G. POTW Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	1/Y	1/Y
POTW inspection of:	1/Y	1/Y
SIU self-monitoring:	12/Y	4/Y
SIU reporting:	2/Y	2/Y

*Russel Stover is monitored 1/week

41. List exceptions: **NONE**
42. List those SIUs that were not sampled by the POTW within the last 12 months. [DSS: 403.8(f)(2)(v)]
NONE
43. List those SIUs that were not inspected within the last 12 months. [DSS: 403.8(f)(2)(v)]
NONE (inspections usually done during October-December.
44. How many industries were neither sampled nor inspected within the last 12 months. [DSS: 403.8(f)(2)(v)]
{NOIN}{RNC/SNC} NONE
45. Does the POTW sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)] **YES**

46. Sample/Analysis Procedures:

Chain-of-Custody always used?: YES	Sampling method, metals: Composite
Ability to sample on short notice? YES	Sampling method, CN: GRAB
In-house analysis of toxic pollutants: NONE	Sampling method, O&G: GRAB
Do in-house analytical methods conform to 40 CFR part 136? YES (pH)	

47. How does the POTW document its industrial user inspections? **Checklist provided by KDHE.**

48. Does the POTW evaluate all SIUs at least every two years to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)] **All industries are required to submit SCP**
- a. Describe the method used by the POTW to evaluate the need for a slug control plan. **Required.**

II.H. IU Self Monitoring and Reporting

49. Are all Categorical IUs required to self-monitor for all pollutants regulated by the respective Categorical standard at least twice per year? [403.12(e)] **YES**
50. Were any Baseline Monitoring Reports or 90 day Compliance Reports due within the past 12 months? If so, from whom? Were the reports submitted? **N/A**
51. Are IUs required to report spills, slug discharges, etc. to the POTW? [403.12(f)] **YES**
52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] **YES**
53. Are IUs required to resample and submit results within 30 days following a violation as per 403.12(g)(2)? **YES**

II.I. Data Management

54. Are files/records computerized? **Both.**
55. Are all records maintained for at least 3 years? [403.12(o)] **YES**
56. Are program records available to the public as required by 40 CFR 403.14(b)? **YES**
57. Does the POTW have provisions to address confidential business information? [403.14(a)] **YES**
58. How is compliance status calculated? Describe the procedure used in determining Significant Noncompliance (eg. are mo. avg. violations considered as well as daily max?).
Following EPA Definition. Manually calculated when violations occurred.

II.J. Program Resources

59. What percent of the Pretreatment Coordinator's time is spent on pretreatment? **One Person about 15%**
60. What computer programs does the POTW use for:

Word processing:	Google
Spreadsheet:	Google
Database:	

61. Does the POTW believe its annual budget adequate for implementation? **YES \$7,000 to 15,000.**
- a. If not, is the level of money available for pretreatment less than that in the approved program or approved modification? **NA**

II.K. Special Questions

62. Are there any issues that the POTW would like to discuss?
NO Sanitary Sewer overflow in the past 12 months.

The system has inflow and infiltration problems due to its age and degradation of the

original construction materials. Maintenance and repair activities are conducted by city staff. Multiple areas of the collection system identified by camera or smoke testing as needing repairs have been relined or replaced. The city has been budgeting \$200,000 per year that is utilized to repair or replace lines to eliminate I&I issues. Staff has also been refurbishing one lift station per year.

PART III: FILE AND RECORDS REVIEW

Following is a table containing the POTW's Significant Industrial User inventory regulated by its Pretreatment Program. Please verify that all information in the table is correct and current. For those industries no longer regulated draw a line through the entry. Add all new industries and provide the information sought by the table. Below is a guide to the information sought by the table and suggested abbreviations.

INDUSTRY:

Provide the name of each industrial user regulated under the pretreatment program.

CAT STND:

Provide the categorical standard code number. For example, industries subject to the Metal Finishing regulation should be designated "433." For noncategorical industries indicate "NA" in this column.

REG PROCESS:

Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to Metal Finishing regulations because it performs zinc and chromium plating indicate with "ZnCrPL" or a similar abbreviation.

TMT:

If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE:

Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precip/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG FLOW:

Provide the industry's average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1000.

TOT FLOW:

Provide the average daily total plant flow in gallons per day.

CWF:

Indicate if the industry uses the Combined Wastestream Formula to determine compliance with categorical standards. "Y" = yes, "N" = no.

COMPLIANCE STATUS FOR THE 6 MO PERIOD ENDING:

For the six month periods listed, indicate if the industry's compliance status. Use the following abbreviations:

CIn compliance with all standards: no violations.

IInfrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.

SNC,SIn significant noncompliance with discharge standards.

SNC,RIn significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.

SNC,MIn significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.

SNC,C Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by th

III.B. Significant Industrial User Compliance Evaluation

63. From the above list of industries, how many are in Significant Noncompliance (SNC) with either discharge standards or reporting requirements based on the most recent six-month reporting period? **{PSNC} NONE**

64. List by name, those industries currently on a compliance schedule. Complete the table below. **NONE**

Industry Name	Date Schedule Issued	Compliance Deadline	How Administered*
---------------	----------------------	---------------------	-------------------

65. List those industries last published in the newspaper for noncompliance and provide the date (or attach a copy of the public notice). **NONE**

66. If an industry has been deleted from the list of Significant Industrial Users list by name below and provide the reason. **NONE**

67. For those industries in SNC within the last 12 months complete the following table for all written enforcement actions. **NONE**

IU Name	Violation	Date of POTW knowledge	Date of Action	Enforcement Action	ERP required action
---------	-----------	------------------------	----------------	--------------------	---------------------

68. Provide the total number of NOV's, Administrative actions, Judicial referrals, and criminal prosecutions that occurred in the last twelve months. **{FENF} {JUDI}**

Two verbal NOV's to Russel Stover for pH violations.

69. Were all actions taken by the POTW within 30 days of knowledge of a violation? **{RNC/SNC} YES.**

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the POTW within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the POTW) of the violation? **{RNC/SNC} NONE**

III.C. Control Mechanism Evaluation

71. Do the POTWs control mechanisms: Permittee: **Precision Pump 40 CFR 433.17 and Gates Rubber**

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (no > 5 yrs.):	YES	Cite the POTW's legal authority:	YES
Contain the correct discharge limits:	YES	Identify TTO alternatives, if applicable:	YES
Specify sample type for IU self monitoring:	YES	Require notification within 24 hrs of a violation:	YES
Adequately identify sampling location:	YES	Require resample/report in 30 days of violation:	YES
Specify sampling frequency:	YES	Specify right of entry:	YES
State applicability of civil or criminal penalties:	YES	Reserve right to revoke permit:	YES
Stipulate reporting frequency:	YES	Specify immediate slug load notification:	YES
Properly require records retention:	YES	Require submission of all sampling results:	YES
Specify limited transferability:	YES		

III.D. Industrial Inspection Evaluation

72. Do the Industrial Inspection reports contain? **Gates Rubber**

Name of Company contact:	YES	Evaluation of IU's monitoring procedures:	YES
Date of inspection:	YES	Verification of wastewater flow rates:	YES
Time of inspection:	YES	Determination of applicability of the CWF:	YES
Description of manufacturing process:	YES	Description of the chemical storage area:	YES
Description of treatment process, if any:	YES	Identification of potential spill conditions:	YES
Evaluation of IU's monitoring methods:	YES		
Verification of production rates that would affect production based standard:			NA

III.E. Slug Discharge Control Procedures

73. If the POTW has required the submittal of a Slug Control Plan, does it contain: [40 CFR 403.8(f)(2)(vi)]

Not looked at during the inspection. Just looked at if the city reviewed them.

- _____ A description of discharge practices including non-routine batch discharges
- _____ A description of stored chemicals
- _____ Procedures for immediate notification of slug discharges with written follow-up notification
- _____ Procedures necessary to prevent adverse effects at the POTW's treatment plant:
- _____ inspection and maintenance of storage areas
 - _____ handling and transfer of materials
 - _____ loading and unloading operations
 - _____ control of plant site runoff
 - _____ worker training
 - _____ building of containment structures
 - _____ measures for the control of toxic organics
 - _____ measures for emergency response

74. COMMENTS

City requires all industries to submit SCP but does not review plans as required, if any.

III.F. Industrial User File Review Checklists

Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the POTW's Significant Industrial Users. When reviewing SIU files priority should be placed on Categorical industries that either have a history of violations or that appear to be in compliance but have not installed that prescribed BAT technology to consistently meet discharge limits. While only three pages are provided the reviewer is encouraged to copy and add additional review pages for larger POTWs.

Industry Name: **Precision International (Precision Pump)**
Principal Pollutants: **Under 433.17 and O&G (TTO = SMP)**
Products: **Oil field pumps**

No. of Employees: **50**

A. Does the file system for the industrial user contain:

☒ YES	Permit application	☒ YES	POTW sampling results
☒ YES	Current Permit	☒ YES	Self-monitoring reports
☒ YES	Correct limits in Permit	☒ YES	Enforcement documentation
☒ YES	Correspondence/meeting notes/phone log	☒ YES	Solvent Management Plan (6/16/2024)
☒ YES	Most recent inspection report	☒ YES	Correct application of the CWF
☒ YES	Evaluation for need for Slug control	☒ YES	Slug Control Plan
☒ YES	Compliance status determination		

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months? **NO**
[403.12(f)]

☐ Immediate notification by the IU	☐ Follow-up written notification
☐ POTW response	☐ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU 1/YEAR Inspect the IU 1/YEAR

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year? **YES**

F. Frequency in the IU's control mechanism for: Self-monitoring 4/YEAR Reporting 2/YEAR

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?
YES

H. Did the POTW identify all IU violations from:

IU Self-monitoring NA POTW Compliance monitoring NA

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
NONE					

Industry Name: **Gates Rubber 40 CFR 428**
Principal Pollutants: industrial hoses
Products: **O&G, pH, TTO, Flow**

No. of Employees: **380**

A. Does the file system for the industrial user contain:

☒ YES	Permit application	☒ YES	POTW sampling results
☒ YES	Current Permit	☒ YES	Self-monitoring reports
☒ YES	Correct limits in Permit	☒ YES	Enforcement documentation
☒ YES	Correspondence/meeting notes/phone log	☒ YES	Solvent Management Plan
☒ YES	Most recent inspection report	☒ YES	Correct application of the CWF
☒ YES	Evaluation for need for Slug control	☒ YES	Slug Control Plan
☒ YES	Compliance status determination		

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months? **NO**
[403.12(f)]

☐	Immediate notification by the IU	☐	Follow-up written notification
☐	POTW response	☐	Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU 1/YEAR Inspect the IU 1/YEAR

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year? **YES**

F. Frequency in the IU's control mechanism for: Self-monitoring 4/YEAR Reporting 2/YEAR

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?
YES

H. Did the POTW identify all IU violations from:

IU Self-monitoring NA POTW Compliance monitoring NA

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
NONE					

Industry Name: **Russel Stover Candies**

Principal Pollutants: **BOD, TSS, O&G, pH**

Products: **Chocolate candy**

No. of Employees: **375**

A. Does the file system for the industrial user contain:

☒ YES	Permit application	☒ YES	POTW sampling results
☒ YES	Current Permit	☒ YES	Self-monitoring reports
☒ YES	Correct limits in Permit	☒ YES	Enforcement documentation
☒ YES	Correspondence/meeting notes/phone log	☒ NA	Solvent Management Plan
☒ YES	Most recent inspection report	☒ NA	Correct application of the CWF
☒ YES	Evaluation for need for Slug control	☒ YES	Slug Control Plan
☒ YES	Compliance status determination		

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months? **NO**
[403.12(f)]

☐ Immediate notification by the IU	☐ Follow-up written notification
☐ POTW response	☐ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU **1/YEAR** Inspect the IU **1/YEAR**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year? **YES**

F. Frequency in the IU's control mechanism for: Self-monitoring **4/YEAR** Reporting **5/YEAR**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?
YES

H. Did the POTW identify all IU violations from:

IU Self-monitoring **YES** POTW Compliance monitoring **YES**

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? **YES- I-pH.**

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of</u>	<u>Date of</u>	<u>Date of</u>	<u>ERP</u>	<u>POTW</u>
	<u>Violation</u>	<u>POTW</u>	<u>POTW</u>	<u>Required</u>	<u>POTW</u>
		<u>Knowledge</u>	<u>Response</u>	<u>Response</u>	<u>Response</u>
<u>pH</u>	<u>10/6/2022</u>	<u>10/6/2022</u>	<u>10/6/2022</u>	<u>NOV</u>	<u>NOV</u>