U.S. Environmental Protection Agency
Region 5

Purpose: Clean Water Act National Pollutant Discharge Elimination System Inspection

Facility: Maynard Steel Castings Company
2856 South 27th Street
Milwaukee, Wisconsin 53215

Inspection Date: November 7, 2023

EPA Representatives:
Jake Berger, Physical Scientist, (312) 353-8024, berger.jake@epa.gov
Ben Atkinson, Inspector, (312) 353-8243, atkinson.ben@epa.gov

Wisconsin Department of Natural Resources Representatives:
Grace Barlow, Stormwater Specialist
Jamie Lambert, Wastewater Specialist

Facility Representatives:
Robert Wabiszewski, Environmental Manager
Donna Nagy, Human Resources and Purchasing Director
Jose Montoya, Health and Safety Manager

Report Prepared by:
Jake Berger, Physical Scientist
Water Enforcement and Compliance Assurance Branch, Section 1

Inspector Signature and Date: Berger, Jake Digitally signed by Berger, Jake Date: 2023.11.30 15:11:54 -06'00'

Approver Name and Title:
Molly Smith, Section 1 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2023.12.04 13:53:38 -06'00'

PURPOSE OF INSPECTION

The purpose of the inspection by the U.S. Environmental Protection Agency (EPA) at Maynard Steel Casting Company (Maynard Steel or Facility) was to investigate elements of the Clean Water Act (CWA) and their National Pollutant Discharge Elimination System (NPDES) permit.

BACKGROUND

Maynard Steel is a foundry that makes custom steel castings for a variety of industries. Maynard Steel melts scrap steel with other materials, such as aluminum, nickel, molybdenum, and ferrosilica, using an electric arc furnace. The mixture is then poured into a foundry sand mold to make the piece. The sand is held by large steel sand flasks, which are periodically discarded. Maynard Steel operates 24 hours per day, Monday through Friday. Maynard Steel is an independently, privately owned company with 132 employees. Industrial stormwater discharges at Maynard Steel are authorized by the Wisconsin Department of Natural Resources (WDNR) Tier 1 Industrial Storm Water General Permit No. WI-S067849-5 (Permit), which has an Effective Date of May 31, 2021, and an Expiration Date of June 2, 2025.

INSPECTION

Jake Berger and Ben Atkinson of the EPA, and the WDNR representatives, first arrived at the Facility at 8:50 a.m. CST, and were met by Donna Nagy (Human Resources and Purchasing Director) and Jose Montoya (Health and Safety Manager). Jake Berger and Ben Atkinson showed them their credentials and identification and began the opening conference. Robert Wabiszewski (Environmental Manager) joined the opening conference at 9:38 a.m. CST.

Opening Conference

USEPA staff explained that the purpose of the inspection was to:

- Review Maynard Steel's records, including sample measurements, monitoring activities, and stormwater plans, as required by the Permit;
- Conduct a walkthrough of the Facility;
- Identify locations where stormwater controls had the potential to be insufficient; and
- Inform Maynard Steel of areas of concern regarding the records review and facility walkthrough.

During the opening conference, Donna Nagy, Jose Montoya, and Robert Wabiszewski provided the following information to the EPA:

- The only water used onsite is noncontact cooling water for the furnace, which is recycled and not discharged.

- Maynard Steel owns the property which extends to the fence line surrounding the Facility.

- Maynard Steel has two permanent stormwater outfall pipes that emerge from the slope just south of the Facility and discharge into the Kinnickinnic River.

    - These stormwater outfalls also discharge water from underground drainage tiles and a sump pump.

- The outdoor east yard contains spent foundry sand, scrap metals, steel sand flasks, and steel casting pieces.

- Spent foundry sand is taken away by a beneficial reuse company that comes daily to pick up sand.

- All products and materials are brought in and out by truck.

Records Review

Robert Wabiszewski provided a hard copy of Maynard Steel's Storm Water Pollution Prevention Plan (SWPPP), but was unable to provide or electronically access any of the other necessary stormwater documents for the Facility during the inspection. Jake Berger requested that the following documents be provided via email, to be reviewed after the inspection:

- The most recent version of the SWPPP;
- The most recent Annual Facility Site Compliance Inspection;
- The two most recent Monthly site self-inspection forms;
- The two most recent Quarterly Stormwater Visual Monitoring forms; and
- The two most recent Annual Chemical Stormwater Sampling and Analysis results.

The above documents were provided via email by Robert Wabiszewski on November 15, 2023. Jake Berger then reviewed these documents, and the following area of concern was identified:

- Section 4.3.3 of the Permit requires Annual Chemical Storm Water Sampling and Analysis to be conducted once within the first 12 months of the Permit's effectiveness (i.e. by May 31, 2022) and again within the second 12 months of the Permit's effectiveness (i.e. by May 31, 2023). Maynard Steel submitted their two most recent Annual Chemical Stormwater Sampling and Analysis results, which showed that the samples were collected on December 4, 2017, and September 25, 2018, indicating that these analyses have not yet been conducted as required since the Permit became effective in 2021.

The opening conference ended at 11:02 a.m. CST and was immediately followed by a Facility walkthrough with Robert Wabiszewski and Jose Montoya.

Facility Walkthrough

The EPA staff made the following observations during the Facility walkthrough with Robert Wabiszewski and Jose Montoya, further documented in the Photograph Log (attached):

- Scrap material stored in areas of the parking lot do not have any stormwater control measures in place around them (Photos 7 and 8).

- The paved slope from the south edge of the parking lot leads directly down to the Kinnickinnic River and has no stormwater control measures in place (Photo 6).

- The fenced perimeter of the east yard has several locations where there is either a gap in the stormwater containment berm (Photos 12 and 15) or a failure of the berm and fence, where spent sand flasks have fallen over (Photos 13, 14, and 17).

- The only stormwater control measure for the spent foundry sand pile is a silt fence along a small portion of the pile (Photo 16).

The Facility walkthrough ended at 1:11 p.m. CST and was immediately followed by the closing conference.

Closing Conference

The EPA staff began the closing conference and relayed preliminary comments to Robert Wabiszewski and Jose Montoya regarding the lack of stormwater control measures in the parking lot, the stormwater berm gaps and failures, the steel sand flasks that had fallen over, the lack of containment around the sand pile, and the requested documents to be provided electronically. Robert Wabiszewski confirmed that no information collected during the inspection was considered Confidential Business Information. The EPA concluded the inspection and left the Facility at 1:24 p.m. CST.

Maynard Steel Casting Co.
EPA Inspection November 7, 2023
All photos taken by Jake Berger, Physical Scientist, U.S. EPA
Camera: Olympus Tough TG-6 Serial No. BJ5B54657

1: PB070001
Description: Southwest corner of parking lot
Location: Parking lot
Camera Direction: Southwest
Date/Time: November 7, 2023 / 11:13 a.m. CST

2: PB070002
Description: Outfall 1, actively discharging groundwater from underground drainage tiles and sump pump.
Location: Outfall 1
Camera Direction: North
Date/Time: November 7, 2023 / 11:26 a.m. CST

3: PB070003
Description: Discharge from Outfall 1 flowing downhill into the Kinnickinnic River.
Location: Outfall 1
Camera Direction: South
Date/Time: November 7, 2023 / 11:28 a.m. CST

4: PB070004
Description: Outfall 2
Location: Outfall 2
Camera Direction: North
Date/Time: November 7, 2023 / 11:35 a.m. CST

5: PB070005
Description: Outfall 2
Location: Outfall 2
Camera Direction: North
Date/Time: November 7, 2023 / 11:36 a.m. CST

6: PB070006
Description: Paved slope from south edge of the parking lot down to the Kinnickinnic River.
Location: Parking lot
Camera Direction: South
Date/Time: November 7, 2023 / 11:46 a.m. CST

7: PB070007
Description: Spare material area along south edge of parking lot
Location: Parking lot
Camera Direction: East
Date/Time: November 7, 2023 / 11:53 a.m. CST

8: PB070008
Description: Spare material area
Location: Parking lot
Camera Direction: Northeast
Date/Time: November 7, 2023 / 11:55 a.m. CST

9: PB070009
Description: Stormwater drain in parking lot which discharges to Outfall 1.
Location: Parking lot
Camera Direction: South
Date/Time: November 7, 2023 / 11:58 a.m. CST

10: PB070010
Description: Stormwater drain in parking lot discharging to Outfall 1; connected to and receieves water from the drain shown in Photo 9.
Location: Parking lot
Camera Direction: South
Date/Time: November 7, 2023 / 12:02 p.m. CST

11: PB070011
Description: East yard showing the spent foundry sand pile and spent sand flasks.
Location: East yard
Camera Direction: Northeast
Date/Time: November 7, 2023 / 12:16 p.m. CST

12: PB070012
Description: Gap in stormwater containment berm behind sand flasks
Location: East yard
Camera Direction: East
Date/Time: November 7, 2023 / 12:19 p.m. CST

13: PB070013
Description: Sand flasks fallen over onto fence at the top of the slope above the Kinnickinnic River.
Location: East yard
Camera Direction: South
Date/Time: November 7, 2023 / 12:23 p.m. CST

14: PB070014
Description: Failure of stormwater berm and fence
Location: East yard
Camera Direction: Northeast
Date/Time: November 7, 2023 / 12:26 p.m. CST

15: PB070015
Description: Gap in the stormwater containment berm behind the sand flasks
Location: East yard
Camera Direction: South
Date/Time: November 7, 2023 / 12:32 p.m. CST

16: PB070016
Description: Spent foundry sand pile
Location: East yard
Camera Direction: West
Date/Time: November 7, 2023 / 12:36 p.m. CST

17: PB070017
Description: Sand flasks fallen over onto fence at the top of the slope above the Kinnickinnic River.
Location: East yard
Camera Direction: West
Date/Time: November 7, 2023 / 12:40 p.m. CST