REPORT OF INDUSTRIAL USER COMPLIANCE SAMPLING INSPECTION

AT
Landoll Company LLD
20th Street Extension
Marysville, KS 66508

KANSAS PRETREATMENT PERMIT: KSP000014

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7

Enforcement and Compliance Assurance Division
June 13, 2023

INTRODUCTION

I conducted an Industrial User Compliance Sampling Inspection at Landoll Company (Landoll), Marysville, Kansas, on June 13, 2023. The inspection was conducted under the authority of Section 308 of the Clean Water Act (as amended) and in accordance with EPA Region 7 Standard Operating Procedures. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Landoll Company:
Jonas Smith, Plant Manager
Email: jonas.smith@landoll.com
Leroy Sibley, Environmental Coordinator
Email: leroy.sibley@landoll.com

U.S. Environmental Protection Agency (EPA), Region 7:
Joe Heafner, Life Scientist, (913) 551-7091
Email: heafner.joseph@epa.gov

FACILITY DESCRIPTION

Landoll Corporation manufactures agriculture equipment, trailers, forklifts, and construction equipment utilizing flat and/or bent steel tubing. Raw materials utilized in the process include, but are not limited to: flat or square rolled steel, flat steel, round tubes, and aluminum tubes. Raw materials are cut, sawed, bent, and welded in the manufacturing process. Parts are prepared for painting by being cleaned in a shot blast process. The parts are then sent into an iron phosphate rinsing process before the parts enter either a wet paint or a powder coat painting process. Wastewater from wet paint process discharges approximately 250 gallons per use. The powder coat line discharges to a 5,000 sump which is discharged via a float-controlled sump pump during its use. The facility is subject to the 40 C.F.R. Part 433 Metal Finishing Regulations for new sources.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced at 10:00 a.m. on June 13, 2023. presented my credentials to Mr. Smith and Mr. Sibley, explained the purpose and procedures of the inspection. I also stated that during the inspection, I would collect samples of the facility's process wastewater that is discharged to the city of Marysville. Twenty-two photos were taken during the inspection (attachment 1). I completed the Region 7 inspection checklist after the completion of the inspection (attachment 2).

SAMPLING PROCEDURES:

On June 13, 2023, I collected grab samples from the three pits that collects process wastewater from the Shop 10 area (Outfall 001). These grab samples were then composited into one sample. I also collected a grab sample from the one pit that collects process wastewater from the Shop 20 area (Outfall 002).

To be consistent with how the facility samples process wastewater, I composited grab samples from Outfall 001 and 002 into one sample and had it also analyzed.

Process wastewater from the torch tables (Outfall 003) was not discharging at the time of the inspection, therefore no sample was collected.

All three samples taken during the inspection were submitted for metals analysis only. The samples were collected in clean containers for analysis, preserved as appropriate, cooled with ice to maintain 4 degrees Celsius. The temperature and pH analyses were performed immediately on site.

All samples collected were transported to the EPA Region 7 Laboratory. Chain-of-custody procedures were used for all samples. All appropriate Region 7 standard operating procedures in the collection, packaging, transportation, and handling of the samples were followed.

FINDINGS AND OBSERVATIONS

1. Permit: A Kansas Pretreatment Permit for Landoll Corporation became effective on January 1, 2023 and will expire December 31, 2027 (attachment 3). The permit requires the facility to monitor its effluent for flow, pH, metals (cadmium, chromium, copper, lead, nickel, silver, zinc), total toxic organics (TTOs), and cyanide. The permit also places numerical limitations on those parameters. The permit further requires the facility to sample and analyze the parameters on a quarterly basis and submit discharge monitoring reports (DMRs) to KDHE on a semi-annual basis, by January 28 and July 28 of each year.

Mr. Smith stated that the facility operates three shifts, five days per week and has approximately 800 employees.

Mr. Sibley described each process wastewater operation. He stated that within the Shop 10 area, there was an older parts wash system consisting of five tanks. The overflow from the tanks flows into a pit located near the tanks. He also explained that there were two other pits that collect process wastewater from parts washing areas. He stated that process wastewater from the combined pits from the Shop 10 area is discharged through Outfall 001.

Mr. Sibley described the parts washer in the Shop 20 area as a newer parts washer that prepares parts for powder coating. He stated that this parts washer consists of wash and rinse tanks that overflow into a centralized 5,000 gallon pit that discharges when full (approximately three to four times per month).

Mr. Sibley also explained that the facility has three torch tables that also generate process wastewater on an infrequent basis. He stated that the process wastewater from the tables is discharged on an as needed basis approximately twice per year.

2. Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status from 2020 – 2022, which were provided in the Excel spread sheet by the facility. After the review, I placed the spreadsheets in the ECAD electronic file system. I found no exceedances of the effluent limits during the review.

3. Water Balance: A reasonable water balance was achieved following the inspection. Mr. Leroy provided the production water records during the inspection. He stated that domestic water usage is metered separately. According to water purchase records provided by Mr. Leroy, from February 2023 to May 2023, it was determined that the facility consumed approximately 31,000 gallons for an average of 7,800 gallons per month within the production facility. The facility's DMRs identify that Outfall 001 typically discharges 20 days at 250 gallons per discharge, equating to 5,000 gallons per month. The estimated capacity for Outfall 002 5-stage (only 3 are used) washer was given at 5,000 gallons. Mr. Leroy stated that the Outfall 002 tank is released one to two times per month.

5. Total Toxic Organics: The facility can certify compliance with the Metal Finishing limit established for Total Toxic Organics (TTO) provided it is following the provisions of its approved Solvent Management Plan. Mr. Sibley provided a copy of the Solvent Management Plan after the completion of the inspection. I reviewed the Solvent Management Plan, then placed the plan into the ECAD electronic file system.

6. Sample Results: Analytical results for samples collected during the inspection are presented in the table below. The complete data transmittal package is included as attachment 4.

Sample Results For Landoll, mg/L

	Ag		Cd		Cr		Cu		CN		Ni		Pb		Zn		pH (s.u.)	
	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Dmax	Mavg	Min	Max
Outfall	0.43	0.24	0.11	0.07	2.77	1.71	3.38	2.07	1.2	0.65	3.98	2.38	0.69	0.43	2.61	1.48	5	10
1	ND		ND		0.106		0.394		Not Sampled		0.15		0.104		1.44		11.45	
2	ND		ND		ND		0.0307		Not Sampled		ND		ND		2.58		6.63	
001 & 002	ND		ND		0.0539		0.203		Not Sampled		0.0816		ND		1.61		10.8	
Result:	C		C		C		C		NA		C		C		C		V	

Results of the sampling indicate that the facility violated the pH limits during the sampling event of June 13, 2023.

8. Other Observations: During the inspection, I observed an uncovered container with metal shavings that was leaking lubricating oil (photo 21). I noted that the oil was contained around the container, however, during precipitation events, the oil could flow into the stormwater conveyance system that is around the facility. The facility has applied for and received a general permit for industrial stormwater discharges from the facility (G-BB 13-0002). I asked and received a copy of the facility's Stormwater Pollution Prevention Plan (attachment 5). The SWPPP requires that an annual inspection of all stormwater controls be conducted. I reviewed the SWPPP and the annual inspections and they appeared to be consistent with the requirements of the industrial stormwater permit.

SUMMARY

- Samples taken during the inspection indicated that the facility violated the limits of pH during the inspection.
- The facility needs to implement best management practices to limit the exposure of oil and waste metal to stormwater.

JOSEPH HEAFNER
Digitally signed by JOSEPH HEAFNER
Date: 2023.07.27 09:30:38 -05'00'

Joe Heafner
Life Scientist

Moran, Nicole
Digitally signed by Moran, Nicole
Date: 2023.07.27 09:40:24 -05'00'

Nicole Moran
Section Chief

Attachments:

1. Photos and Photo Log (25 pages)
2. Region 7 Industrial User Inspection Checklist (6 pages)
3. Kansas Pretreatment Permit (16 pages)
4. Data Transmittal Packet for Activity JAH2316 (19 pages)
5. SWPPP (11 pages)