

**REPORT OF INDUSTRIAL USER AND INDUSTRIAL STORMWATER COMPLIANCE
SAMPLING INSPECTION**

**AT
B&W CUSTOM TRUCK BEDS, INC.
1216 HWY 224, HUMBOLDT, KANSAS 66748**

**KANSAS PRETREATMENT PERMIT: KSP000051
KANSAS STORMWATER No.: KSR000357**

**BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

**Environmental Sciences & Technology Division
December 13, 2023**

INTRODUCTION

At the request of the Enforcement Compliance and Assurance Division, I conducted an Industrial User Compliance Sampling Inspection at the B&W Custom Truck Bed facility in Humboldt, Kansas, on December 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

B&W Custom Truck Beds, Inc. (B&W):

Dan Willis, Safety Manager, 620-473-3664, danwillis@turnoverball.com

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

Brian D'Alfonso, Biologist, 913-551-5095, dalfonso.brian@epa.gov

FACILITY DESCRIPTION

The B&W facility in Humboldt is a 500,000 sq. ft. facility which primarily manufactures several types of trailer hitches for trucks, as well as farm/ranch gates and other products. Facility personnel explained that the majority of the ag division is being discontinued and were producing very minimal pieces. The facility maintains the capability to produce custom truck beds which is its legacy business. However, this is a very small percentage of its current business. A diagram of the facility (from the permit application) is included as Attachment 3. The facility has approximately 500 employees and operates three shifts, five days per week.

Steel parts are machined, welded, and prepped for painting by conversion coating in one of two automated 5-stage zirconium-based washers (referred to as, Ag-powder and hitch powder), or a

14- stage zirconium-based washer/electronic painting (referred to as, E-coat) system. Parts can also be prepped for painting by hand-spraying in a wash bay, a spray booth, or a in small vibratory finish process line. Parts can be painted by electro-painting at the end of the 14-stage E-coat system, by powder coating, or by liquid painting. The locations of the various regulated process wastewater production processes are shown on the Facility Diagram, and all are considered regulated wastewaters under 40CFR Part 433, Metal Finishing. No electroplating is performed at the facility as electroplated parts are brought in from an off-site vendor.

A flow diagram for the wastewater treatment system is included as Attachment 4. Process wastewater from the two 5-stage cleaners and the 14-stage E-coat system is pumped to an E-coat wastewater treatment system which is located near the end of the 14-stage E-coat system. The pH of this wastewater is adjusted if necessary and then pumped to the EQ tank where it mixes with flow from the spray booth, wash bay, and vibratory finish line. The pH of the wastewater leaving the EQ tank is continuously monitored and can be adjusted and shut off automatically at the outfall 001 tank if it is not within permit limits (photos 1 & 2). Final effluent is discharged from the Outfall 001 tank and passes through a flow meter prior to discharge to the City's collection system. In 2023 the average daily flow was between 17,000 and 23,000 gpd. No solids are produced by the facility's wastewater treatment system.

The facility has a reverse osmosis (RO) water treatment system which produces process water for the cleaning/painting lines. The RO system produces reject water from bypassing and flush operations at approximately six gallons per minute. The facility's water balance sheet (attachment 5) shows that the system generates approximately 57,000 gallons per month of reject water. The RO reject water does not pass through the treatment system but is discharged separately at a point near but downstream of the outfall 001 flow meter.

INSPECTION PROCEDURES

Facility personnel were not notified prior to the inspection. I arrived at the facility unannounced on the morning of December 13, 2023, introduced myself, presented my credentials to Mr. Willis, and I explained the purpose and procedures of the inspection. I conducted the physical inspection of the facility that morning focusing on inspecting the wastewater generation, collection, treatment, and discharge processes. I completed the inspection by filling in an Industrial User Inspection Checklist which is included as Attachment 1. I completed the inspection that afternoon by collecting samples then conducting an exit briefing with Mr. Willis. Photos taken at the time of inspection can be found in attachment 2.

SAMPLING PROCEDURES

On December 13, 2023, I collected grab samples of the wastewater effluent for permit parameters from the surface of the facility's wastewater discharge tank which serves as outfall 001. The samples were collected directly into clean individual sample containers for analysis, preserved as appropriate, and cooled with ice to maintain 4°C. In addition, a grab sample was analyzed for temperature and pH 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

Permit: A Kansas Pretreatment Permit was issued to B&W in June of 2023 and will expire May 31, 2028 (Attachment 6). The permit requires the facility to monitor its effluent for flow, pH, cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), nickel (Ni), silver (Ag), and zinc (Zn), cyanide, and total toxic organics (TTOs). 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 (January 28 and July 28 of each year).

Discharge Monitoring Reports (DMRs): I reviewed the facility's compliance status for the last six reporting periods (June 2021 through December 2023) which was provided by facility personnel after the inspection. I found that the facility was in compliance for each of those periods. In addition, I examined this data and found that all discharge limits and monitoring requirements were met.

Water Balance: An accurate water balance was achieved as part of the inspection. The facility utilizes one source of water (city of Humboldt). The facility purchased an average of approximately 460,000 gallons of water each month through the first six months of 2023. This is according to the facility's water balance spreadsheet (attachment 5). The facility reported that it had discharges approximately 388,000 gallons per month through outfall 001. The facility's water balance spreadsheet also shows 1000 gallons of coolant make-up water, approximately 57,000 gallons of RO reject water and approximately 15,700 gallons of sanitary sewer discharge.

Solvent Management Plan (SMP): I observed a copy of the facility's SMP and found it to be adequate.

EPA Sample Results: Analytical results of the effluent samples collected during this inspection are provided below and are included as Attachment 7, EPA Sample Analysis Results for B&W. I reviewed the effluent sample data in the table below and found that the effluent met permit limits.

Table 1. Analytical Results for Effluent Samples Collected During Inspection

Parameter	Outfall 001	Outfall 001 Limits
Cd (mg/L)	ND	0.11
Cr (mg/L)	0.154	2.77
Cu (mg/L)	0.053	3.38

Pb (mg/L)	ND	0.69
Ni (mg/L)	0.107	3.98
Ag (mg/L)	ND	0.43
Zn (mg/L)	0.028	2.61
pH (S.U.)	8.35	5.0-10.0
Temp (°C)	35.5	NA
Flow (MGD)	0.024	NA

- 1 Permit limits are daily maximums. Permit limits for pH are minimum followed by maximum.
- 2 “ND“ denotes a non-detect result.

Storm Water: While at the facility, I also inspected the facility for stormwater requirements. The facility is required to have stormwater permit coverage due to their manufacturing processes. The facility had a Stormwater Pollution Prevention Plan (SWPPP), dated November 1, 2023, available for inspection during my visit (attachment 8). After reviewing the facility’s SWPPP, I conducted a walkthrough inspection outside of the facility to observe their stormwater management. Generally, the facility’s stormwater management was well managed and did not appear to have pollutants leaving the site (photos 4-10).

Stormwater flows to one of four outfalls (photos 4 & 9) as seen in the facility’s site map, included in their SWPPP. At the time of inspection, the facility had four different site maps, that when combined, included most of the items required by the general permit. The maps did not include all items required by the general permit, including fuel storage, as required by section 2.4.2(b) of the general permit. This was noted as item #1 on the Notice of Preliminary Findings (NOPF) that was left on-site after the inspection.

While reviewing the facility’s SWPPP, I found that the SWPPP did not include a description of quarterly inspections as required by the general permit. While discussing this with the facility, it was determined that the facility has not been conducting inspections on at least a quarterly basis as required in section 2.4.3(d) of the general permit. This was noted as item #2 in the NOPF left on-site.

While walking around the perimeter of the facility, I observed all of the facility’s outfalls (photos 4 & 9). While discussing the outfalls and the facility’s visual inspections, it was determined that facility personnel were not collecting a sample of the stormwater to visually inspect as recommended by section 2.4.4(a) and 2.4.5(a) of the general permit. Facility personnel stated that they visually inspect the stormwater as it flows through the outfalls. This was noted as item #3 on the NOPF left on-site.

While reviewing the SWPPP, I also found that the SWPPP did not include a description of training provided for existing employees, as required by section 2.4.3(e) of the general permit. The general permit requires the SWPPP to include training for new and existing employees. The facility’s SWPPP as reviewed at the time of inspection only provided for training of new employees. This was noted as item #4 on the NOPF that was left on-site.

Summary: During the exit meeting on December 12, 2023, I went over the facility’s rights to claim confidential business information. The facility did not make any claims of confidentiality (attachment 9). During the exit briefing I issued a NOPF for the following (attachment 10):

- 1) Update SWPPP Site Map to include all elements required by general permit.
- 2) Site inspections are not being conducted or included in SWPPP.
- 3) Visual inspections do not include a visual inspection of samples at each outfall.
- 4) SWPPP does not include a description of training for existing employees.

On December 28, 2023, facility personnel submitted a written response to the preliminary findings listed above (attachment 11). Along with the written response, the facility submitted an updated SWPPP, dated December 2023 (attachment 12).

**BRIAN
D'ALFONSO**
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D'ALFONSO
Date: 2024.02.20
12:19:45 -06'00'
Brian D'Alfonso
Biologist

**JODI
BRUNO**
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Date: 2024.02.21
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Jodi Bruno
Branch Manager, ECAD/WB

Attachments:

1. EPA Industrial User Inspection Checklist (6 pages)
2. Photo Log (11 pages)
3. Facility Diagram (1 pages)
4. Flow Diagram (1 pages)
5. Facility Water Balance (1 pages)
6. B&W Trucks Permit # KSP000051 (17 pages)
7. Data Transmittal Packet for Activity BPD2404 (13 pages)
8. Storm Water Pollution Plan (SWPPP) (10 pages)
9. Confidential Business Information Form (4 pages)
10. December 12, 2023, NOPF (1page)
11. December 28, 2023, facility response (1 pages)
12. Updated SWPPP (11 pages)