EPA Region 1Annual Pretreatment Report Summary Sheet
November 2021

POTW Name: Town of Ware Water Pollution Control Plant (W.P.C.P.)

NPDES Permit #: MA0100889

Pretreatment Report Period Start Date: 9-29-2020

Pretreatment Report Period End Date: 9-28-2021

# of Significant Industrial Users (SIUs): 1

# of SIUs Without Control Mechanisms: 0

# of SIUs not Inspected: 0

# of SIUs not Sampled: 0

# of SIUs in Significant Noncompliance (SNC) with Pretreatment Standards: 0

# of SIUs in SNC with Reporting Requirements: 0

# of SIUs in SNC with Pretreatment Compliance Schedule: 0

# of SIUs in SNC Published in Newspaper: 0

# of SIUs with Compliance Schedules: 0

# of Violation Notices Issued to SIUs: 0

# of Administrative Orders Issued to SIUs: 0

# of Civil Suits Filed Against SIUs: 0

# of Criminal Suits Filed Against SIUs: 0

# of Categorical Industrial Users (CIUs): 0

# of CIUs in SNC: 0

Penalties

Total Dollar Amount of Penalties Collected: $ 0.00

# of IUs from which Penalties have been collected: 0

Local Limits

Date of Most Recent Technical Evaluation of Local Limits: 6-10-2010

Date of Most Recent Adoption of Technically Based Local Limits: 7-1-2016

Pollutant	Limit (mg/l)	MAHL (lb/day)
Zinc	8.53	6.05
TSS	208.1	147.5
Turbidity	49 NTU	

TOWN OF WARE, MASSACHUSETTS
Department of Public Works
4 ½ Church St
P.O. Box 89
Ware, MA 01082
Tel. 413-967-9620 Fax 413-967-9622

November 26, 2021

U.S. Environmental Protection Agency Region 1
Water Compliance Section (Mail Code 04-03)
Attn: Douglas Koopman
5 Post Office Square - Suite 100
Boston, MA 02109

U.S. Environmental Protection Agency Region 1
Regional Pretreatment Coordinator (Mail Code 06-03)
Attn: Justin Pimpare
5 Post Office Square - Suite 100
Boston, MA 02109

Massachusetts Department of Environmental Protection – Western Regional Office
Bureau of Resource Protection
436 Dwight Street, Suite 402
Springfield, MA 01103

Re: **Industrial Pretreatment Annual Report**
Town of Ware NPDES Permit No. MA0100889

To Whom It May Concern:

Part I.E.3 of the National Pollutant Discharge Elimination System (NPDES) permit (Permit No. MA0100889) for the Town of Ware's Water Pollution Control Plant (WPCP) requires the Town to submit an annual report to EPA and MassDEP describing the activities taken by the WPCP's industrial pretreatment program taken during the past year. We submit the following annual report to meet the requirements of the NPDES permit to detail the pretreatment program activities during the twelve (12) month period ending 60 days prior to the due date of the report (i.e. November 28, 2020). Therefore, this report covers the period from September 29, 2020 through September 28, 2021.

The annual report is consistent with the format described in Attachment B of the NPDES permit ("NPDES Permit Requirement for Industrial Pretreatment Annual Report"). Permit requirement text is shown in *italics*.

1. *An updated list of all industrial users by category, as set forth in 40 C.F.R. 403.8 (f) (2) (i), indicating compliance or noncompliance with the following:*

   The Town of Ware's WPCP has one non-categorical significant industrial user: Kanzaki Specialty Papers (Kanzaki or KSP), located at 20 Cummings Street in Ware.

   This facility is primarily engaged in the manufacturing of coated paper (paper converting facility). Many operations are involved in the manufacturing of the coated paper, including raw material storage, cutting, coating application, paper drying, material cleaning, packaging, and material reclamation. Kanzaki produces four major types of coated paper including thermal imaging, pressure sensitive, ink jet (and graphic arts), and thermal films. In some cases, multiple coatings are applied to the paper (i.e., thermal then pressure sensitive coating). The products are made using purchased paper stock and proprietary coatings which are formulated on-site. The coated paper is then converted to specific roll sizes. No further processing of the paper occurs at the plant. The raw materials used in the industrial process are proprietary but consist of wetting agents, defoamers, dispersants, optical brighteners, wax, pigments, binders, dyes and developers. KSP is under NAICS Code 325992. The pretreatment operation utilizes chemical addition in a clarification process to remove suspended solids generated from the manufacturing operations and the solids dewatering process.

   KSP's most recent Industrial Wastewater Discharge Permit was effective on March 1, 2020 and expires on March 1, 2023. Note that this permit was modified in October 2020 to address a comment received by EPA during a Pretreatment Program Audit to update the local limits in Table 2 to include TSS, which was listed in existing permits and was left off the updated permit seemingly by mistake.

   a. *Baseline Monitoring reporting requirements for newly promulgated industries*

      This is not applicable as KSP is not a newly promulgated industry.

   b. *Compliance status reporting requirements for newly promulgated industries*

      This is not applicable as KSP is not a newly promulgated industry.

   c. *Periodic (semi-annual) monitoring reporting requirements*

      Section III of KSP's Industrial Wastewater Discharge Permit specifies periodic sampling and monitoring reporting requirements. These requirements are reproduced from the permit below (Table 3 from permit for sampling protocol and Table A for sampling frequency).

      During the past year, KSP was in compliance with the sampling protocol and submitted all the necessary monitoring reports completely and in accordance with the submittal instructions.

TABLE 3: SAMPLING PROTOCOL					
PARAMETER	DAILY MAXIMUM	MONTHLY AVERAGE	SAMPLE METHOD	SAMPLE TYPE	SAMPLE FREQUENCY
Flow	-	-	NA	RECORDER	Continuous
pH	6.5 – 9.5	NA	NA	RECORDER	Continuous
Zinc	8.53 mg/L 6.05 lb/d	NA	EPA 200.8	24-Hour Flow Paced Composite	Bi-Monthly
TSS	208 mg/L 147.5 lb/d	NA	EPA 160.2	24-Hour Flow Paced Composite	Bi-Monthly
Turbidity	49NTU	NA	EPA 180.1	24-Hour Flow Paced Composite	Continuous
Alkalinity	-	-	EPA 310.1	24-Hour Flow Paced Composite	Quarterly
Copper	"	"	EPA 200.8	24-Hour Flow Paced Composite	Monthly
Aluminum	"	"	EPA 200.8	24-Hour Flow Paced Composite	Monthly
Phosphorus, Total	"	"	EPA 365.2	24-Hour Flow Paced Composite	Monthly
Ortho Phosphorous	-	-	EPA 365.2	24-Hour Flow Paced Composite	Monthly
Ammonia (as N)	"	"	EPA 350.1	24-Hour Flow Paced Composite	Monthly
Nitrate	"	"	EPA 300.0	24-Hour Flow Paced Composite	Monthly
Nitrite	"	"	EPA 300.0	24-Hour Flow Paced Composite	Monthly
Surfactants	-	-	EPA 425.1	24-Hour Flow Paced Composite	Quarterly
BOD	"	"	EPA 405.1	24-Hour Flow Paced Composite	Quarterly

TABLE A: SAMPLING FREQUENCY REQUIREMENTS		
SAMPLING FREQUENCY	SAMPLING PERIOD	SUBMIT REPORT BY
Quarterly	January – March April – June July – September October - December	April 15 July 15 October 15 January 15
Monthly	January – December	15th of following month
Bi-Monthly	January – December	Submit with monthly reports
Continuous	January – December	Submit with monthly reports

Notes:

1. Quarterly testing must be conducted each day for five consecutive business days of wastewater operations for all constituents requiring quarterly and monthly sampling.
2. In the quarterly report to the Town, KSP must report totalized daily flow, daily average pH and turbidity, as well as maximum and minimum pH, and turbidity for each day of the previous quarter.

d. Categorical standards

KSP is not subject to categorical standards.

e. *Local limits*

The local limits approved by EPA on June 10, 2010, are summarized in the following table. These limits are also included in Section I.D of the KSP Industrial Wastewater Discharge Permit (Table 1 reproduced below)

TABLE 1: LOCAL LIMITS APPROVED BY USEPA JUNE 10, 2010

Maximum Allowable Industrial Headworks Loading (MAIHL)

POLLUTANT	MAIHL (mg/L)	MAIHL (lbs/d)
Zinc	8.53 mg/L	6.05 #/day
TSS	208.1 mg/L	147.5 #/day
Turbidity	49 NTU	

These limits are also included in Section I, Part E (Table 2), along with a maximum daily flow limit of 125,000 gallons and a monthly average flow limit of 85,000 gallons.

2. *A summary of compliance and enforcement activities during the preceding year, including the number of:*

   a. *Significant industrial users inspected by POTW (include inspection dates for each industrial user)*

The KSP facility was inspected by Town of Ware officials on September 22, 2021. This inspection was scheduled. The Chief Plant Operator and a staff member from the Town of Ware, Department of Public Works met with the KSP Sr. Director of Operations and the KSP Environmental Specialist. The DPW director position was vacant at the time of the inspection. Town of Ware officials collected a split sample and toured the pretreatment plant. In accordance with recommendation from the EPA IPP audit conducted on September, 23 2020, the Town completed the inspection using the Inspection Checklist from the EPA's Industrial User Inspection and Sampling Manual for POTWs. Please find the inspection checklist attached. The inspection revealed no issues, and it appeared that KSP's operations were in compliance with their IPP permit.

b. Significant industrial users sampled by POTW (include sampling dates for each industrial user)

A grab sample from the KSP composite sampler for the industrial treatment effluent was collected by Town of Ware staff during the inspection of the KSP facility on September 22, 2021. On the day of inspection, KSP recorded discharging 33,159 gallons. The composite effluent samples were tested for Total Suspended Solids, Turbidity, pH, Total Aluminum, Total Copper, and Total Zinc. The following table lists the results from that sampling compared to the KSP industrial permit effluent limitations and to results from KSP's sampling completed on September 22, 2021. Moreover, the pH and Turbidity data recorded by KSP are consistent with the measurements the Town staff observed on the real-time inline instruments during the inspection.

Table B: Summary Comparison of Town and KSP Sampling

Parameter (units)	Results from Town's September 22, 2021 Sample	Detection Limit	Permit Effluent Limitation	KSP Results from September 22, 2021
Zinc (ug/l)	130	5.0	8.53 (6.05 lb/day)	120 (0.03 lbs)
pH (SU)	6.87	NA	6.5 to 9.5	6.81 to 6.85
TSS (mg/l)	14	2.0	208.1 (147.5 lb/day)	43 (0.83 lbs)
Turbidity (NTU)	11.1	0.10	49	14 to 24.7
Aluminum (ug/l)	56	3.0	N/A	51
Copper (ug/l)	<1.0	1.0	N/A	<1

c. Compliance schedules issued (include list of subject users)

No compliance schedules were issued.

d. Written notices of violations issued (include list of subject users)

No written notices of violations were issued.

e. Administrative orders issued (include list of subject users)

No administrative orders were issued.

f. Criminal or civil suits filed (include list of subject users) and

No criminal or civil suits were filed.

g. Penalties obtained (include list of subject users and penalty amounts)

No penalties were obtained.

3. *A list of significantly violating industries required to be published in a local newspaper in accordance with 40 C.F.R. 403.8(f) (2) (vii)*

   There are no significantly violating industries that have required publication in the local newspaper.

4. *A narrative description of program effectiveness including present and proposed changes to the program, such as funding, staffing, ordinances, regulations, rules and/or statutory authority;*

   As of the date of this letter, the Town of Ware's current Industrial Pretreatment Program is effective in managing industrial flows to maintain compliance with our NPDES permit, and therefore no changes are proposed.

5. *A summary of all pollutant analytical results for influent, effluent, sludge and any toxicity or bioassay data from the wastewater treatment facility. The summary shall include a comparison of influent sampling results versus threshold inhibitory concentrations for the Wastewater Treatment System and effluent sampling results versus water quality standards. Such a comparison shall be based on the sampling program described in the paragraph below or any similar sampling program as described in this Permit. At a minimum, annual sampling and analysis of the influent and effluent of the Wastewater Treatment Plant shall be conducted for the following pollutants.*

   a. *Total Cadmium*
   b. *Total Chromium*
   c. *Total Copper*
   d. *Total Lead*
   e. *Total Mercury*
   f. *Total Nickel*
   g. *Total Silver*
   h. *Total Zinc*
   i. *Total Cyanide*
   j. *Total Arsenic*

   The sampling program shall consist of the 24-hour flow-proportioned composite and at least one grab sample that is representative of the flows received by the POTW. The composite shall consist of hourly flow-proportioned grab samples taken over a 24-hour period if the sample is collected manually or shall consist of a minimum of 48 samples collected at 30-minute intervals is an automated sampler is used. Cyanide shall be taken as a grab sample during the same period as the composite sample. Sampling and preservation shall be consistent with 40 CFR Part 136.

   The Town of Ware completed the required sampling to meet the requirements listed above for reporting as part of this Annual IPP Report. Tables C, D, and E below summarize the influent, effluent, sludge, and toxicity results for the testing at the Ware WPCP.

   Table C summarizes the influent and effluent composite and grab sampling at the Ware WPCP, which were collected on September 22, 2021, to be consistent with the inspection date. Also shown are the Water Quality Criteria for the respective pollutants.

TABLE C
Ware WPCP Influent and Effluent Testing Results

Parameter	Effluent	Influent	Unit	DL	Chronic WQ Criteria
Composite					
Aluminum	91	280	ug/L	3.0	87
Arsenic	< 1.0	< 1.0	ug/L	1.0	150
Beryllium	< 2.0	< 2.0	ug/L	2.0	NA
Cadmium	< 0.10	0.17	ug/L	0.10	0.78
Chromium	< 1.0	6.7	ug/L	1.0	25.95
Copper	13	51	ug/L	1.0	2.67
Lead	< 1.0	4.4	ug/L	1.0	0.49
Mercury	< 0.5	< 0.5	ug/L	0.5	0.77
Molybdenum	< 2.0	<2.0	ug/L	2.0	NA
Nickel	< 2.0	4.2	ug/L	2.0	15.10
Selenium	< 2.0	< 2.0	ug/L	2.0	3.1
Silver	< 2.0	< 2.0	ug/L	2.0	NA
Zinc	18	150	ug/L	5.0	34.62
Grab					
Total Cyanide	< 0.01	< 0.01	mg/L	0.01	0.0052 (free CN)

Notes: Water Quality Standards listed represent chronic criteria (CCC) in freshwater based on EPA's published National Water Quality Limits. For some metals, the criteria are a function of certain water quality parameters of the receiving waters (eg. hardness, pH, DOC). For these parameters, the criteria were based on the values listed in the NPDES permit Factsheet.

Table D summarizes the sewage sludge testing results from September 21, 2021. All results are presented in mg/kg dry. Method SW-846 6010C was used except for mercury, where Method SW-846 7471B was used, and Total Cyanide, where Method SW-846 9012B. The sludge sample that was analyzed was 1.5% solids.

Table E summarizes the quarterly Whole Effluent Toxicity (WET) tests conducted at the Ware WPCP. All four quarterly tests met the LC50 permit limit of 100% and the C-NOEC permit limit of 10%.

TABLE D
Ware WPCP Sewage Sludge Testing Results

Pollutant	Concentration	Detection Limit
Aluminum	41000	330
Arsenic	< 170	170
Beryllium	< 3.3	3.3
Cadmium	< 17	17
Chromium	< 100	100
Copper	580	170
Lead	< 130	130
Mercury	< 6.2	6.2
Molybdenum	< 170	170
Nickel	< 67	67
Selenium	< 330	330
Silver	< 67	67
Zinc	880	130
Total Cyanide	< 640	640

TABLE E
Ware WPCP WET Test Results

	Ceriodaphnia dubia	
Date	**Acute (LC-50)**	**Chronic (C-NOEC)**
November 2020	>100%	50%
February 2021	>100%	50%
May 2021	>100%	50%
August 2021	>100%	100%

Table F summarizes the monthly monitoring at the KSP industrial facility. Multiple samples are collected and measured daily. The monthly data shown in Table F are on the daily samples collected.

TABLE F
Kanzaki Specialty Papers Monthly Monitoring Results

Month	Flow (g/d)		pH			Turbidity (NTU)		Zinc (Daily Max)		TSS (Daily Max)	
	Avg	Max	Max	Min	Avg	Max	Avg	mg/L	lb/d	mg/L	lb/d
Permit Limit	--	*125,000*	*9.50*	*6.50*	--	*49*	--	*8.53*	*6.05*	*208*	*147.5*
Oct-20	22,153	32,890	7.21	6.52	6.76	47	24	0.24	0.04	28	5.1
Nov-20	21,242	39,016	7.28	5.94 ***	6.79	47	27	0.17	0.04	20	4.4
Dec-20	20,123	35,590	7.54	6.48 *	6.90	47	26	0.29	0.07	24	5.3
Jan-21	18,589	24,325	7.63	6.50	6.82	46	30	0.22	0.04	24	4.1
Feb-21	19,695	32,381	7.94	6.50	6.93	48	30	0.39	0.11	20	3.2
Mar-21	21,339	50,400	7.50	6.42 *	6.99	47	29	0.49	0.06	80	13.1
Apr-21	16,810	27,676	7.49	6.50	6.79	47	30	0.17	0.03	7	1.0
May-21	19,493	30,496	7.10	6.50	6.81	47	28	0.32	0.05	22	3.5
Jun-21	25,141	33,712	7.65	6.50	7.00	47	30	0.30	0.07	34	7.1
Jul-21	23,042	46,728	7.41	6.50 **	6.98	46	25	0.16	0.03	22	4.3
Aug-21	20,935	31,438	7.43	6.51***	6.95	47	25	0.08	0.02	46	6.1
Sep-21	23,793	40,198	7.13	6.50	6.82	46	25	0.12	0.03	24	5.4

Notes:

* pH was less than 6.5 for less than 5 minutes on two days this month
** The lower than normal pH value occurred during the pH calibration
*** The lower than normal pH value was a result of a no-flow condition

6. *A detailed description of all interference and pass-through that occurred during the past year.*

   No interference or pass-through have occurred in the past year.

7. *A thorough description of all investigations into interference and pass-through during the past year.*

   There were no investigations as no interference or pass-through occurred.

8. *A description of monitoring, sewer inspections and evaluations, which were done during the past year to detect interference and pass-through, specifying parameters and frequencies.*

   No monitoring, sewer inspections or evaluations were conducted since no interference or pass-through occurred.

9. *A description of actions being taken to reduce the incidence of significant violations by significant industrial users; and*

   No actions were taken to reduce the incidence of significant violations as no significant violations occurred.

10. *The date of the latest adoption of local limits and an indication as to whether or not the permittee is under a State or Federal compliance schedule that includes steps to be taken to revise local limits.*

    The local limits for the KSP permit were approved by the EPA and adopted on June 10, 2010. The permittee is not under a compliance schedule.

If you have any questions about this report or our Industrial Pretreatment Program as required by the Permit, please contact the undersigned at 413-967-9620.

Sincerely,

Charles Niedzwiecki
Interim Director of Public Works

XIII. Notes

The *Notes Section* is available for all other inspector observations such as any unusual conditions and problems.

INDUSTRIAL USER INSPECTION CHECKLIST

I. General Inspection Information

Name of industry: Kanzaki Specialty Papers

Date of visit: 9-22-2021 | Visit start time: 0745 | Visit end time: 0900

Inspection Type/Purpose: [X] Scheduled [ ] Unscheduled [ ] Enforcement [ ] Complaint [ ] New Company [ ] Follow-up [ ] Permit Renewal [ ] Spill/Slug

Name of inspectors/affiliation: David Comeau/Chief Plant Operator, Town of Ware
William Robidoux/DPW, Town of Ware
* DPW Director Position currently vacant.

Printed name: David Comeau | Signature Date: [signature] 9-22-2021

Last inspection date: 11-18-2020

Inspected by: David Comeau

Did the previous inspection identify deficiencies that the industrial user was required to correct? [ ] Yes [X] No

Were deficiencies corrected? [ ] Yes [ ] No | Explain:

List all observed noncompliance issues and any corrective action that has been taken, or is planned:

Provide the name(s) and title(s) of industry representative(s)

Printed Name(s): Jay Jankauskas | Title/Phone number(s): Sr. Director of Operations, 413-967-8866
Sam Dowd | Environmental Specialist, 413-967-8847

Email(s): jjankauskas@kanzakiusa.com sdowd@kanzakiusa.com

Signature [signature] Date: 9-22-2021

II. General Facility Information

Physical address of industry: 20 Cummings Street, Ware, Ma. 01082

Mailing address of industry: Same

IU Permit Number:	Permit Exp. Date:	IU Classification(s):	NAICS Code(s):
17E	3-1-2023	Noncategorical	325992

Is the industrial user permit on file at the facility? [X] Yes [ ] No

If the facility is a CIU, is it correctly categorized? [X] Yes [ ] No | Explain:

Nature of operation and reason for industrial user classification: Interference with POTW

Number of employees:	Number of shifts:	Hours of operation/Days per week:
170	2	24/7, varies

Are there scheduled shut down periods [X] Yes [ ] No | When: as needed

Seasonal production? [ ] Yes [X] No | When:

Number of wastewater discharge points to the POTW: one	
All discharge points accounted for? ☒ Yes ☐ No	If no, explain:
III. Production/Process Areas	
Comprehensive process description (identify raw materials, processes used, products produced/amount of finished product, and wastes and their destination; attach a process diagram if available) or if in City's file, so reference: Refer to Slug Discharge Plan	
Describe any substantial changes in manufacturing processes (changes that have occurred and changes that are planned): No changes	
Production and flows verified for Production-Based CIUs? ☐ Yes ☐ No ☒ N/A	
Has there been any production or flow changes since the last inspection? ☐ Yes ☒ No If yes to either, has production or flow increased or decreased greater than 20% ☐ Yes ☐ No	
Did the industrial user report changes in process(es) to the POTW? ☐ Yes ☐ No ☒ NA	
Describe the condition of process area(s): OK	
Describe any housekeeping concerns: OK	
Do floor drains/troughs lead to the POTW? ☐ Yes ☒ No	
Are incompatible process/raw materials separated? ☒ Yes ☐ No	
Are pipes labeled/color coded with directional flow arrows for easy identification? ☒ Yes ☐ No	
Are temporary hoses in place as part of production? ☐ Yes ☒ No	
Is a comprehensive piping diagram available at the facility? ☒ Yes ☐ No	
Are process tanks labelled? ☒ Yes ☐ No ☐ NA	
Are storage tanks labelled? ☒ Yes ☐ No ☐ NA	
Is the industrial user meeting its best management practices requirements? ☒ Yes ☐ No ☐ NA	
How often is the production area cleaned? Frequently	
What chemicals are used in the cleaning of the production area? soap/detergent + water	
Is the wastewater generated from cleaning the production area discharged to the POTW? ☒ Yes ☐ No ☐ NA after Treatment	
Attach a schematic description of the production process(es) at the facility (or if in City's file, so reference). Refer to Slug Discharge Plan	
IV. Wastewater Production	
Water source(s): cooling, seal water, wash, and coating process	
Water usage:	
Is water consumption balanced with wastewater production? ☐ Yes ☒ No Explain: Usage is higher than discharge due to evaporation	
Wastestream flow(s) discharged to the POTW (describe and include flow when available): Data received in monthly reports	
Production process(es): Refer to Slug Discharge Plan	
Contact cooling water: small amount	
Boiler blowdown/makeup: Minimal	
Evaporation (loss): Yes	
Non-contact cooling water: NO	
Lawn maintenance/Irrigation (loss): NO	

Are there any diversion meters in use (credit given for water used in final product, evaporation or lawn care)? ☐ Yes ☒ No

Sanitary: No

Wastewater hauled offsite (include names of haulers and destination):

Other: Solids

Sanitary: (gpd)	Process: (gpd)	Combined: (gpd)

Describe any substantial changes in wastewater flow (changes that have occurred and changes that are planned):

No Changes

Did the industrial user report changes in wastewater flow to the POTW? ☐ Yes ☐ No ☒ NA

Is dilution of the wastewater stream occurring, or is there any potential for dilution? ☐ Yes ☒ No

Attach a comprehensive schematic of wastewater production and wastewater discharge points to the POTW's system or if in City's file, so reference.

V. Pretreatment System

Does the industrial user treat its process wastewater prior to discharge to the POTW? ☒ Yes ☐ No ☐ NA

Type of pretreatment system (Describe and include comprehensive schematic description if available or if in City's file, so reference):

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☒ Chemical Precipitation w/Clarifier	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☐ Sludge Filter Press	☐ Grease Trap	☐ Rotary Macro Screen	☐ Solvent Distillation
☐ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☐ Belt/Disk/Rope Oil Skimmer	☐ CN Destruct	☐ Hex Cr Reduction	☐ Segregation of Streams
☐ Surfactants	☐ Work Tank Agitation	☒ De-Foaming	☐ Chelating Agents

☒ Continuous flow ☐ Batch ☐ Combined

Condition/operation of pretreatment system: ☒ Good ☐ Fair ☐ Poor

Explain condition rating A

Are equipment maintenance records maintained and available for review? ☒ Yes ☐ No ☐ NA

Are equipment calibration records available, and are calibration frequencies adequate? ☒ Yes ☐ No ☐ NA

Does the industrial user have a critical spare parts inventory? ☒ Yes ☐ No ☐ NA

Is the detention time/mixing time in the pretreatment system adequate? ☒ Yes ☐ No ☐ NA

Is the pH monitoring system working properly? ☒ Yes ☐ No ☐ NA

Does the industrial user have a continuous pH monitoring system? ☒ Yes ☐ No ☐ NA

Is the pretreatment system operator trained and certified? ☒ Yes ☐ No ☐ NA

Is there an operator for each shift? ☒ Yes ☐ No ☐ NA

Has the system experienced operational/upset problems since the last inspection? ☐ Yes ☒ No ☐ NA

Describe:

VI. Slug/Spill Controls, Best Management Practices

Who has the authority to halt the discharge from the facility should a spill or slug discharge occur? on shift foreman

How are employees informed of whom to call at the POTW in case of a spill or slug discharge? Refer to Slug Discharge Plan Instructions also posted.

Is the facility required to implement a slug discharge control plan? ☒ Yes ☐ No ☐ NA
If a slug plan is not currently required, should one be? ☐ Yes ☐ No Explain:
Is the slug discharge control plan appropriate for current conditions? ☒ Yes ☐ No ☐ NA
Does the permit require or allow BMPs? ☐ Required? ☐ Allowed? ☐ Voluntary? ☒ NA
Types of BMPs
☒ Installation of treatment
☒ Prohibitions on certain practices, activities or discharges
☐ Requirements for operation and maintenance of treatment units
☒ Timeframes associated with key activities
☒ Compliance certification, reporting and records retention
☒ Slug discharge control plan
☐ Solvent management plan
☐ Other
Description of Required BMPs: NONE
Description of Allowed BMPs:
Description of Voluntary BMPs:

P2 Equipment/Practices in use:	
☒ Overflow Alarms	☒ Aqueous Cleaning Solutions
☐ Fog/Halo Spray Rinsing	☐ Countercurrent Cascade Rinsing
☐ Dragout Collection Trays	☒ Seal-Less Pumps
☐ Air Jets/Curtains	☐ Horizontal Work Tank Negative Air Blankets
☐ Electrolytic Recovery	☒ Cartridge or Membrane Filtration
☐ Aqueous Paint Stripping Solutions	☐ Bead/Powder Blast Paint Removal
☒ Biocide Addition to Lengthen Coolant Life	☐ Centrifugation of Machining Coolant
☐ Flow Restrictors	☐ Overspray Recycle
☐ In-Situ Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Probes
☐ Dead/Stagnant Rinse Tanks	☒ Evaporation

Are BMPs installed correctly? ☒ Yes ☐ No ☐ NA
If Yes, does the BMP require installation of further treatment technology? ☐ Yes ☒ No ☐ NA
Explain:
Does facility have its own EMS or a similar version? ☒ Yes ☐ No ☐ NA
Is the facility ISO 14001 certified? ☐ Yes ☒ No ☐ NA
Corrective actions necessary? ☐ Yes ☒ No ☐ NA
Explain:

Completion Date:

VII. Chemical Storage

Chemical storage area (identify the chemicals that are maintained on site and how they are stored): submitted to Town through Right To Know Act

Any floor drains? ☐ Yes ☒ No | Any spill control measures? ☒ Yes ☐ No

Can chemicals reach floor drains if spilled? ☒ Yes ☐ No

Is chemical containment needed? ☒ Yes ☐ No

How often are floors washed? as needed | What chemicals are used? Detergents

How often is equipment washed? as needed | What chemicals are used? Detergents

Does the facility have the potential for a slug discharge? ☒ Yes ☐ No

Is the facility required to have a slug control program? ☒ Yes ☐ No

Is the slug discharge control plan available onsite? ☒ Yes ☐ No

Is the slug discharge control plan still adequate? ☒ Yes ☐ No

Has the facility had any past slug discharges? ☒ Yes ☐ No

Are signs posted to inform employees about improper discharge practices? ☒ Yes ☐ No

VIII. Sludge Generation

If the facility generates sludge or hauls regulated wastes, please complete the following information. *(If not, go to next section)*

Sludge dewatering method (plate/frame filter, belt press, rotating drum vacuum, centrifuge, indexing paper filters, etc.): screw press | Amount generated (55 gal barrel [bbl]/mo): 25 Tons / month

Where does the liquid from dewatering go? closed loop system | Disposal method: Landfill

Sludge Storage (bbl): open 15 yard roll off | Shipment frequency: once a week | Manifests available? ☒ Yes ☐ No

Sludge hauler(s): Waste Management | Disposal location(s): Fitchburg Landfill

Is the sludge generated characterized as a hazardous waste? ☐ Yes ☒ No

If yes, are hauling manifests available? ☐ Yes ☐ No

Is any sludge sent off as a valuable raw material? ☐ Yes ☒ No

Examples: Zn sulfate sold to fertilizer mfg.; hydrochloric acid pickle liquor for local POTW's coagulation and phosphorous removal; spent sulfuric pickle liquor to formulate with ammonia for fertilizer; Al hydroxide filter cake in alum form for sale to POTWs; chrome/nickel sludge used to produce ferronickel alloy; etc.

IX. Hazardous Waste Generation

Is hazardous waste generated ☐ Yes ☒ No ☐ NA

Is hazardous waste discharged to the POTW ☐ Yes ☒ No ☐ NA

Manner of hazardous waste disposal: N/A

Are hazardous wastes drummed and labeled? ☐ Yes ☐ No ☒ N/A

Are hazardous wastes held onsite for more than 180 days? ☐ Yes ☒ No

Does the industrial user have hazardous waste manifests? ☐ Yes ☒ No

Any other problems associated with hazardous waste? ☐ Yes ☒ No

Explain:

X. Solid Waste Production

Are solid wastes (other than sludge) produced during manufacturing process? ☒ Yes ☐ No

Describe the types and approximate volumes of solid waste produced: General Trash	
Solid waste disposal method(s): Landfill, Recycling	
XI. Monitoring, Recordkeeping, and Reporting	
Description of sample location: in-line, grab and composite	
Are there any concerns regarding the cleanliness or location of the sampling point? ☐ Yes ☒ No If yes, please explain:	
Sampling method/technique: Split Sampling	
Evaluation of self-monitoring data: ☒ Yes ☐ No ☐ NA	
If yes, was self-monitoring adequate: ☒ Yes ☐ No ☐ NA	
If not, explain why data was inadequate.	
Who performs the self-monitoring analysis? operator on shift	
Are the permit requirements appropriate for:	
Sample location(s)? ☒ Yes ☐ No	If no, explain:
Permit limit(s)? ☒ Yes ☐ No	If no, explain:
Sample method? ☒ Yes ☐ No	If no, explain:
Sample frequency? ☒ Yes ☐ No	If no, explain:
What changes, if any, are needed in the permit? None	
Samples are analyzed according to 40 CFR part 136 method where they exist? ☒ Yes ☐ No If no, Explain:	
If alternative test procedures or modified methods are used (40 CFR 136.4-6), were all requirements met? Yes	
Samples are analyzed within required holding times? ☒ Yes ☐ No	
Samples are analyzed in-house or contract? Both	
If outside lab, what is the lab name? RI Analytical Laboratories	
Samples are preserved according to 40 CFR part 136? ☒ Yes ☐ No	
Samples in required bottle type per 40 CFR part 136? Yes	
Samples are taken during periods of process discharge only? ☒ Yes ☐ No	
Chain-of-custody (COC) form is used? ☒ Yes ☐ No	
If COC is not used, describe documentation:	
COC form is filled out properly? ☒ Yes ☐ No	
Record Keeping	
All information kept for 3 years? ☒ Yes ☐ No	
All required information available, current and complete? ☒ Yes ☐ No	

- The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
- The dates analyses were performed;
- Who performed the analyses;
- The analytical techniques/methods used; and
- The results of such analyses.

Explain:
Reporting
Did the facility report results of any more frequent sampling in the last reporting period? ☐ Yes ☒ No If so, were all results reported? ☐ Yes ☐ No Comments:
POTW notified of all violations identified by industrial user within 24 hours of becoming aware? ☐ Yes ☐ No ☒ NA
If NA, does the POTW do all the facility's monitoring? ☐ Yes ☒ No
Resampling results following violations identified by industrial user submitted within 30 days of becoming aware? ☒ Yes ☐ No
Do sample results match what is reported by the industry? ☒ Yes ☐ No Explain:
Are there any violations that were not reported to the POTW? ☐ Yes ☒ No Explain:
Have bypasses been reported? NO
Have upsets been reported (CIUs)? Yes
XII. Wastestreams Verification/Combined Wastestream Formula
Can flow be measured at all sampling locations? ☒ Yes ☐ No
Are flows measured at each sampling location? ☒ Yes ☐ No
What type of measuring device is used? Parshall Flume
How often are the flow measuring device(s) calibrated? once a month
Is there a calibration log for the flow meter? Yes
Are dilution wastestreams present at the sample location? ☐ Yes ☒ No
Is the CWF used at the facility? ☐ Yes ☒ No
How are the flows determined? Production schedule
Is the facility using dilution to meet its effluent limits? ☐ Yes ☒ No Explain:
Should the facility be using the CWF? ☐ Yes ☒ No
Are there any new flows that need to be considered in the application of the CWF? ☐ Yes ☒ No
Are there any dilution flows that have not been accounted for? ☐ Yes ☒ No

XIII. Notes:

checked Turbidity: in-line Turbidimeter 14.1 NTU
2nd in-line Turbidimeter 14.2 NTU
Bench top Hach 2100 Q 16.5 NTU
Town of Ware LaMotte 2020 11.1 NTU
checked pH: in-line pH meter 6.81
Bench top Thermo Scientific 7.08
Town of Ware Oakton pH 150 6.87
Turbidity and pH checked during 9/22/2021 visit.
TSS sample collected analyzed @ Town of Ware W.P.C.F. Lab. 14 mg/L

Town of WARE W.P.C.P.

Total Solids Test

Laboratory Bench Sheet

Sample Location: Kanzaki Standard Procedure # 2540 D Name: Matt P.

Sample Type: Grab____ Comp. X

Sample Time: 0815 to_____ Date Collected: 9-22-21 Test Date: 9-22-21

Sample I.D. # Kanzaki EFF	K-1	K-2
a) Weight of dish/paper =	1.8323 g	1.8473 g
b) Weight after oven: In 1010 Out 1110	1.8339 g	1.8485 g
d) Weight of total solids (b-a):	0.0016 g	0.0012 g
f) Total solids (d / 100 ml sample) X 1,000,000:	16 mg/L	12 mg/L

TSS *average*: 14 mg/L

*** *** *** *** ***

If this is the last sheet, please make copies before using this sheet

Comeau, David

From: Jay Jankauskas <JJankauskas@kanzakiusa.com>
Sent: Friday, February 26, 2021 9:21 AM
To: Comeau, David
Cc: Gibby Sorel; Chad Sherwood; Sam Dowd
Subject: KSP Wastewater Trial

CAUTION: This email originated from outside of the Town of Ware organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Dave,

Per our conversation yesterday, I am sending you a written plan of a process trial I will be performing next week that may have some effect on Ware's treatment plant:

Current issue: We have a product with a water soluble chemical that gives us problems in our wastewater plant when we run it. Basically, we have to increase our PAC charge considerably which then causes our pH to dip around our low discharge limit, we adjust the pH with lime, but then that increases our solids we have to process. Also when running at a pH below 7.0, our PAC looses its effectiveness.

Process change: Prior to running this product I am planning to increase the pH on our EQ tank to higher than normal using Sodium Hydroxide, typically our EQ tank pH ranges from 7.0 - 7.5. The test I am doing next week is to see how high I can ramp up the pH (without tripping our upper discharge limit of 9.5) and check to make sure there will be no adverse effects on our system during normal operating conditions.

Trial Plan:

Tuesday March 2nd: Around 8:00 AM I will start adjusting the pH of our EQ tank to 8.0. I anticipate that our discharge will be normalized around noon to 2:00 PM. At this point we will just run our clarifier normally throughout the night.

Wednesday March 3rd: Assuming no problems overnight I will adjust the pH on of our EQ tank to 8.5, once again I expect our discharge pH to be normalized around noon to 2:00 PM. At this point we will just run our clarifier normally throughout the night.

Thursday March 4th: Assuming no problems overnight I will adjust the pH on of our EQ tank to 9.0, once again I expect our discharge pH to be normalized around noon to 2:00 PM. After this we will just operate our clarifier normally and let the pH on the EQ tank drift to its normal level.

If you have any concerns about this trial, please don't hesitate to contact me. Also, If at any time during this trial you see any adverse effects on your system, please contact me and I'll halt any further pH increases and bring the pH down if need be.

Thank You

R.I. ANALYTICAL
Specialists in Environmental Services

CHAIN OF CUSTODY RECORD

41 Illinois Avenue
Warwick, RI 02888-3007
800-937-2580 • Fax: 401-738-1970

131 Coolidge St., Suite 105
Hudson, MA 01749-1331
800-937-2580 • Fax: 978-568-0078

Date Collected	Time Collected	Field Sample Identification	Grab or Composite	# of Containers & Type T	Preservation Code P	Matrix Code M	Aluminum, Total (method 200.8) Required MDL = 35 µg/L	Copper, Total (method 200.8) Required MDL = 9 µg/L	Total Zinc (method 200.8)
9-22-21	0815	Kanzaki EFF	C	1 P	N	WW	X	X	X

Yellow copy

Client Information	
Company Name:	Town of Ware Massachusetts – W.P.C.P.
Address:	P.O. Box 89
City / State / Zip:	Ware, MA 01082
Telephone:	413-437-5852 Fax: 413-967-9622
Contact Person:	David Comeau

Project Information	
Project Name:	Industrial Pre-Treatment Program Compliance
P.O. Number:	Project Number:
Report To:	David Comeau Phone: 413-437-5852 Fax: 413-967-9622
Sampled by:	David Comeau
Quote No:	Email address: dcomeau@townofware.com

Relinquished By	Date	Time	Received By	Temp °C	Date	Time
[illegible]	9-22-21	1048	[illegible]	4°	9222	1048

Turn Around Time		
	Normal	X EMAIL Report
X	5-7 Business days.	
	Rush – Date Due: ___/___/___	

Project Comments

Circle if applicable: GW-1, GW-2, GW-3, S-1, S-2, S-3 MCP Data Enhancement QC Package? **No**

Lab Use Only	
↻	Sample Pick Up Only
	RIAL sampled; attach field hours
↘	Shipped on ice
Workorder No:	

Container Types: P=Poly, G=Glass, AG=Amber Glass, V=Vial, St=Sterile
Preservation Codes: NP=None, N=HNO_3, H=HCl, S=H_2SO_4, SH=NaOH, SB=$NaHSO_4$, M=MeOH, T=$Na_2S_2O_3$, Z=ZnOAc, I=Ice
Matrix Codes: GW=Groundwater, SW=Surface Water, WW=Wastewater, DW=Drinking Water, S=Soil, SL=Sludge, A=Air, B=Bulk/Solid, O=_____