

# Prairie AeroSurface Components LLC

Field Brief · Industrial Discharge · 15 May 2026 · v1

## 1. What this is

Aerospace metal finisher, indirect discharger to POTW under 40 CFR Part 433. Chronic compliance issues on chromium, plus PFAS in surfactants and HCN safety exposure in cyanide-bath line.

- POTW pretreatment audit flagged 7 chromium exceedances in last 18 months.
- Categorical user — subject to local limits plus 40 CFR Part 433 numerics.
- PFAS source-control letter from POTW received Q1; response overdue.
- Operator turnover (3 plant managers in 24 months) — institutional drift on SOPs.

## 2. What we'd propose

Categorical pretreatment redesign with PFAS polishing step. Lifts Prairie out of categorical non-compliance and pre-empts the next ELG round. ~\$2.8–4.2M capex over 18 months.

### Cost of alternative — 5-year view

| Dimension                        | Their path (point-fix) | Our proposal  |
|----------------------------------|------------------------|---------------|
| Year-1 capex                     | \$650K                 | \$2.8M        |
| Annual surcharge exposure        | \$180K x 5 yr          | \$0           |
| Forced retrofit (next ELG)       | \$2.1M (yr 3)          | Included      |
| Enforcement risk (5-yr expected) | \$1.4M                 | \$0           |
| Safety-incident exposure (HCN)   | \$2.0M+                | Mitigated     |
| <b>5-YEAR TOTAL</b>              | <b>\$7.05M</b>         | <b>\$2.8M</b> |

Their \$650K point-fix path costs ~\$7M over 5 years when surcharges, forced retrofits, and enforcement exposure are priced in. Our proposal is ~\$2.8M, risk extinguished.

### 3. What could kill it

Three named risks. Plant-manager turnover is the most likely to break the deal — the buyer who agrees in May may not be in seat in September.

#### 1 Decision-maker turnover HIGH

Three plant managers in 24 months. Lock the technical recommendation with the corporate EHS director, not the plant.

#### 2 Capex deferral pressure MEDIUM

Aerospace tier-2; thin margins. A 'point-fix now, retrofit later' counter-pitch from a chemicals vendor is the obvious threat.

#### 3 PFAS regulatory uncertainty MEDIUM

Next ELG round could land lower than our design point. Build optionality into the polish step or risk a 24-month re-do.

### 4. Do this next

Get the corporate EHS director on a 30-minute call this week. Walk the cost-of-alternative table. Establish the categorical-redesign frame before a chemicals vendor reframes it as a point-fix.

#### 1 THIS WEEK

##### Lock the corporate-EHS meeting

Skip the plant. Aim for 30 min with corporate EHS director plus VP of operations. Bring the cost-of-alternative table.

#### 2 WITHIN 14 DAYS

##### Pull POTW pretreatment audit

Public-records request to the POTW. Confirms our chromium exceedance read and gives an evidence anchor for the proposal.

#### 3 WITHIN 30 DAYS

##### Draft categorical-redesign scope

Two-phase redesign — chromium and cyanide in phase 1, PFAS polish in phase 2. Phase 2 trigger pre-defined on ELG.