



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 5, 2007

Re: Hocking County
Carborundum Grinding
Pre-Permit Inspection
Correspondence (IWW)

Mr. James Leonard, Manufacturing Manager
Carborundum Grinding Wheel Co.
1011 East Front Street
Logan, Ohio 43138

Dear Mr. Leonard:

On March 29, 2007, Jack Knapp and I inspected the Carborundum Grinding Wheel facility as a prelude to renewal of Carborundum National Pollutant Discharge Elimination System (NPDES) permit No. 01N00123. During the inspection, we discussed the absence of Monthly Operating Report (MOR) data received by Ohio EPA. Our records show that Ohio EPA's Division of Surface Water did not receive MORs for the months of February 2006 through May 2006. Please contact Ed Swindle at (614) 644-2031 to make sure Ohio EPA has received the necessary MORs.

A review of the MOR data that Ohio EPA does have shows that Carborundum has had numerous exceedences of your NPDES permit limit for oil and grease (O&G). Below are the specific instances of non-compliance with those limits for the time period of January 2004 through May 2006:

Reporting Period	Parameter	Limit Type	Units	Limit	Reported Value	Violation Date
February 2004	Oil and Grease, Total	Daily	mg/L	20	20.1	2/27/2004
November 2004	Oil and Grease, Total	Daily	mg/L	20	36.3	11/23/2004
January 2005	Oil and Grease, Total	Daily	mg/L	20	100.6	1/27/2005
January 2005	Oil and Grease, Total	Monthly	mg/L	15	26.025	1/1/2005
July 2005	Oil and Grease, Total	Daily	mg/L	20	124.3	7/8/2005
July 2005	Oil and Grease, Total	Monthly	mg/L	15	32.675	7/1/2005
June 2005	Oil and Grease, Total	Daily	mg/L	20	49.	6/24/2005
January 2006	Oil and Grease, Total	Daily	mg/L	20	149.1	1/20/2006

As we discussed during our inspection, Carborundum will need to proceed with efforts to eliminate the exceedences of the NPDES permit limit for oil and grease. Additionally, the reported discharge data for phenolic 4AAP is occasionally over 100 ug/l. The periodic high O&G and phenolics suggest operational or maintenance problems. As part of the NPDES permit renewal, Ohio EPA will require that Carborundum develop and implement a Best Management Practices (BMP) manual. The BMP should include, but not be limited to, house keeping issues around the hot and cold press machines. During shift clean-up around press areas, over the water sump, allows for hydraulic oils and dry/clean materials to be dropped into the sump. Secondary containment around the machines, as you suggested, would help contain the oils and other materials which are falling into the sump. The BMP should include a cleaning schedule for the water sump. The water sump has not been cleaned in the last five years and may be the major contributor to the O&G exceedences. The BMP should also include measures to take in reducing the high phenolics being discharges. A maintenance schedule for the oil skimmer should also be included. Carborundum should conduct a extensive water use budget to determine if high flows are washing materials out of the water sump and if water use can be reduced.

Carborundum has periodically purged the waters wells when changing form one well to another. The purge water is discharged through outfall 001. During the change over, in pervious years, this has caused a discoloration of Old Town Creek due to the high iron content of the well water. The switching from one well to another should be done more often to reduce the discharge of large quantities of iron and manganese. When Carborundum is switching or purging the water wells samples should be taken of the discharge and reported on outfall 001 page of the MOR.

A copy of our inspection report is enclosed. The assistance and corporation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5240.

Sincerely,



Randy D. Spencer
District Engineer
Division of Surface Water

RDS/dh

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01N000123	OH0004766	March 3, 2007	R	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Carborundum Wheel Grinding Co. 1011 East Front Street Logan, Ohio 43138	2:00 p.m.	August 1, 2001
	Exit Time	Permit Expiration Date
	3:00 p.m.	July 31, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
James Leonard, Manufacturing Manager	(740) 385-2171, Ext. 307
Name, Address and Title of Responsible Official	Phone Number
Carborundum Wheel Grinding Co. 1011 East Front Street Logan, Ohio 43138	

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>N</u> Flow Measurement	<u>NA</u> Pretreatment
<u>M</u> Records/Reports	<u>NA</u> Laboratory	<u>NA</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>M</u> Effluent/Receiving Waters	<u>M</u> Self-Monitoring Program
<u>M</u> Facility Site Review	<u>N</u> Sludge Storage/Disposal	<u>NA</u> Other
<u>NA</u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

Pre-permit inspection for the NPDES permit renewal. Future requirements: Develop and implement a Best Management Practices document to eliminate O&G exceedences and reduce phenolic discharges.


Randy D. Spencer, Inspector, Ohio EPA, Southeast District Office

4/4/07
Date


Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

4/5/07
Date