



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Putnam County
Unverferth Manufacturing Co., Inc.
IDP Inspection

June 4, 2008

Mr. Greg Steinecker
Environmental & Safety Specialist
Unverferth Manufacturing Co., Inc.
P.O Box 357
Kalida, OH 45853

Dear Mr. Steinecker:

On April 28, 2008, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Unverferth Manufacturing Co., Inc. You were present and provided information on operations and maintenance at the plant. The inspection included a tour of the manufacturing facility, premises, and powder coating process as well as the wastewater pretreatment system. Unverferth Manufacturing uses a powder coating line to paint agricultural equipment.

Unverferth's Indirect Discharge Permit (IDP) was effective on November 1, 2007 and will expire on October 31, 2012. A Spill Prevention, Control Countermeasure Plan for the pretreatment plant is on-hand at the facility, however, an Operation and Maintenance Manual has not been drafted yet. A review of the facility's files shows no reported permit violations since the facility tied into the Village of Kalida on March 20, 2008.

From my observation of the premises, the septic tanks have been crushed and filled in. Since the last inspection, the impervious surface has increased by at least 50%. The product, primed and powder coated agricultural equipment, is being stored on this gravel and paved area. Storm water outfalls which receive water from these storage areas are 002, 003, 006, 007 and 008. Diesel and gas fuel tanks are in the watershed of storm water outfalls 004 and 005. The fuel tanks have broken valves on them and should be repaired immediately for spill prevention measures.

Your factory has an SIC code which requires you to have coverage for storm water under an NPDES permit. Currently, your coverage for storm water discharges exists in your individual NPDES permit. On March 20, 2008 you began to discharge to the Village of Kalida under an IDP, which does not include coverage for storm water. We recommend that you submit an application for coverage under the NPDES general

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permit for storm water discharges associated with industrial activities (or IGP). Once coverage under this general permit is in place, we will eliminate the individual NPDES permit. We require initial sampling be included in your Storm Water Pollution Prevention Plan (SWP3) due to your storage of farm equipment, outside fueling area and the pollutant levels reported in your Individual NPDES permit application. This sampling will verify that the BMPs outlined in your SWP3 are being implemented effectively in controlling discharges of pollutants. However, long term sampling requirements under the general industrial storm water NPDES permit should not be as intensive as under the renewed individual NPDES permit. An alternative to obtaining NPDES permit coverage for your storm water discharges is a conditional exclusion from NPDES permitting, called a No Exposure Certification. This certification is submitted once every five years by operators who have created and maintain a condition of No Exposure of industrial materials or activities to storm water. Additional information about the No Exposure Certification can be found at:
http://www.epa.state.oh.us/dsw/storm/industrial_index.html#Potential%20Waiver.

You do not have an Operation and Maintenance manual for the pretreatment system and instrumentation. From our discussions, it is evident that the success of your system is dependent on careful monitoring of the contaminant levels in the pretreatment system's tanks and using this information toward operation of the pretreatment process. These monitoring procedures and subsequent process controls should be documented to ensure that continued operation of this system will be successful for all personnel involved with its operation. The Operation and Maintenance Plan will also allow for the construction of a preventative maintenance program which will ensure consistent and proper operation of the process equipment and instrumentation.

It appeared that a new building is being constructed in the west portion of the site, but no post construction storm water management facilities were observed. Since over 1 acre of land had been disturbed, discharges of storm water to waters of the state must be covered by either the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit, or CGP) or an individual NPDES permit for construction activities. As of the date of this letter, an NPDES permit application has not been received nor permit coverage granted for this project. Most projects obtain coverage under the CGP. For instructions on obtaining permit coverage, please see:
http://www.epa.state.oh.us/dsw/storm/construction_index.html.

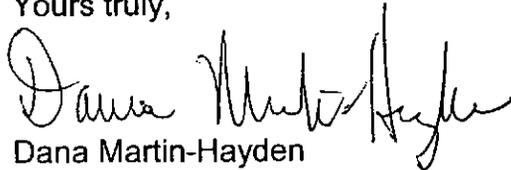
The permit requires that permanent post construction storm water management practices be implemented. For construction activities that disturb a total of 5 acres or more, the permanent structural post-construction practices must be installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality

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Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times shall meet those in Table 2 of the permit.

If you have any questions please call me at (419) 373-3067.

Yours truly,



Dana Martin-Hayden
Division of Surface Water

/lb

Enclosure

pc: ~~DSW-NWDO-File~~ (w/enclosure)
Colleen Weaver, Ohio EPA, DHWM
Julia Zhang, DSW, CO (w/enclosure)

IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name and address of industry Unverferth Manufacturing

Date of visit 4/28/08 Time of visit 10:10 am - 12:15 pm

Name(s) of inspector(s) Dana Martin-Hayden, DSW

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

Name	Title
<u>Greg Steinecker</u>	<u>Environmental & Safety Specialist</u>

Classification assigned by CA:

Did the CA inspector review/obtain the following as part of the industrial inspection?

1. Description of the products manufactured or the services provided by the IU.
2. Verification of the IU's classification or discussion of any changes.
3. Description of any significant changes in processes or flow.
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.)
5. Description of the sample location and any differences in CA and IU locations.
6. Description of the treatment system which is in place.
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention.
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems.

Notes: - Calibration of pH probe should be documented in a log book.
 - Issues with copper carry through from chlorinated Village water in copper pipes should be addressed.
 - Operation and Maintenance manual should be written for the waste water treatment system.
 - Submit General Stormwater Permit NOI for Industrial Stormwater. NPDES direct discharge permit will be NRPD (NO Permit Required)

- Contact Lynette Hablitzel regarding requirements under general construction permit for stormwater discharges.

IU SITE VISIT DATA SHEET (Continued)

IU Name Unverferth Manufacturing	Date 5/13/08
<p>Notes:</p> <p>Unverferth has tied into the Village of Kalida Sewerage system. The three septic tanks on site have been removed.</p> <p>Limits are higher now for the pretreatment process and violations are not a problem at present. We remind you that metals from your facility will discharge to the Village of Kalida WWTP and care should be taken to ensure elevated levels of metals do not limit the disposal options for the biosolids from the Village of Kalida lagoon.</p> <p>From my understanding of the process it appears vital that bath wash water is changed out <u>Quarterly</u>. Process improvements to the wastewater treatment system could provide higher efficiency of treatment, less metals reaching the waste water treatment plant. In addition, a less manual system may reduce the risk of a slug load hitting the WWTP.</p>	

IU SITE VISIT REPORT FORM COMPLETED BY: Dana Martin-Hayden	DATE: 5/13/08
TITLE: Environmental Specialist II	TELEPHONE: 419-373-3067

IU SITE VISIT DATA SHEET (Continued)

IU Name <u>Unverferth Manufacturing</u>	Date <u>5/13/08</u>
<p>Notes:</p> <p>Since the last inspection the impervious surface has increased by at least 50%. The product, primed and painted, farm equipment, is being stored on this gravel and paved area. Storm water outfalls which receive water from these storage areas are 002, 003, 006, 007 and 008. Storage of a diesel and gas fuel tank are in the watershed of storm water outfall 004 and 005.</p> <p>Since the last inspection, a drain located in the machine shop has been filled in and cutoff. They collect floor sweeper wash waters and truck wash waters in a 1000 gal and 2000 gal tank, which is drained out every 6 to 8 weeks.</p>	

IU SITE VISIT REPORT FORM COMPLETED BY: <u>Dana Martin-Hayden</u> TITLE: <u>Env. Specialist II</u>	DATE: <u>5/13/08</u> TELEPHONE: <u>419-373-3067</u>
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INDUSTRIAL USER INSPECTION CHECKLIST

Facility:

Date of inspection: 4/28/08

OH Number: OHP000233

IDP Number: 2DP00084 *AP

Facility Representative: Greg Steinecker

Inspector(s): Dana Martin-Hayden

COMPLIANCE

1. Date of last pretreatment inspection: 12/22/05

2. Has the facility been in compliance with its permit limits since the last inspection? Y N

If no, explain: Copper due to Cl in Village water, now piped to the facility, has caused copper in pipes to dissolve. No violations since new IDP permit in place, due to new connection to Village of Kalida's sewer.

3. Is the facility in compliance with all other requirements?

Sampling procedures

Reporting (late reporting, failure to report, etc)

Compliance schedules

Submitted BMR and 90 day compliance reports

Any other requirements

Y N NA
 Y N NA
 Y N NA
 Y N NA
 Y N NA

If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? Y N

Explain any unresolved actions:

They have connected to the Village of Kalida Sewers.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees 260

6. Shifts/Day: 2

7. Production Days/Year: 260 days/yr

8. Hours/shift: 1st shift 2nd shift

9. Any production changes since the last inspection? Y N

If yes, explain:

Regular 8 10
overtime 10 12

Increase in production, which has steadily gone up and the facility has been working overtime since last September 07. They are planning to go back to regular hours for Summer.

10. General facility description and operations:

Manufacture of Agricultural Equipment
Cutting, shearing, welding, cleaning, powder coating and then a physical and chemical separation of metals in the waste water.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection?
If yes, explain:

Y/N

12. Any expansion or production increase expected within the next year?
If yes, explain:

Y/N

They are expanding production area and therefore will do more powder coating of the additional parts.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

see attached copy.

14. Was a PTI issued for the treatment system?

Y/N

15. Were there any modifications to the treatment system since the previous inspection?

Y/N

If yes, was a PTI obtained?

Y/N

PTI Number:

Date:

16. What is the treatment mode of operation?

Batch / Continuous / Combination

If batch, list the frequency and duration: Now without the NPDES loading limits, they are now able to discharge 3 batches of 2200 gallons treated wastewater for a total of 6600 gpd.

17. Who is responsible for operating the treatment system?

Greg supervises John Decker who operates the systems.

18. How often is the treatment system checked?

Daily inspections are made. (Operated daily)

pH probe is calibrated weekly

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system?

(Y) / N

Explain:

high level alarm on wastewater treatment tank
(prevents overflows of the wastewater)
The treatment system is highly manual with pH adjustment
and chemical addition.

20. Is there an operations and maintenance manual?

Y / (N)

write manual for this highly manual treatment system.

21. Is an inventory of critical spare parts maintained?

(Y) / N

If yes, list:

pumps and pH meters

22. Are there any bypasses in the system?

Y / (N)

If yes, describe the location:

Have bypasses occurred since the last inspection?

NA Y / N

Was the POTW notified?

NA Y / N

23. Are residuals or sludges generated?

(Y) / N

Method of disposal:

TCLP sampled every 2 years - handfilled

Frequency and amount of disposal:

Generate 1/4 ton/week (2-2.2 tons/month)

Name of hauler/landfill/disposal facility:

Deftance Co. landfill

Is any sludge generated subject to RCRA regulations?

None to date

Y / (N)

If land applying sludge, is there a sludge management plan?

NA

Y / N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
Process Waste Water 1. Treatment System	End of Line		6,600 gpd		
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow			6,600		
Noncontact Cooling					
Blowdown					
Reverse Osmosis Condensate			4,320 ^{max} gpd		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary 260 people @ 25 gpd/person			6,500 gpd		
TOTAL FLOW			17,320 gpd		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

Storm water from parts storage area, parking area, landscaping, roofs can be covered under a general storm water permit. Please submit a general storm water permit application for coverage of the facility. IDP does not include storm water and individual NPDES not necessary at this time.

SELF MONITORING

26. Sample location(s) described in the facility's permit: *yes*

"Samples shall be collected at the outlet of the final effluent tank of the pretreatment system"

27. Is the facility sampling at the location(s) described in the permit?
If no, describe the actual location:

Y N

28. Is the location(s) where the facility is sampling representative?
If no, indicate a representative location:

Y N

29. Is the flow measured or estimated?

Measured Estimated

If measured, how often is the meter calibrated?

If estimated, describe method of estimation: *currently using volume of tank to estimate flow (Batch process). Village is requiring a flow meter to be installed.*

30. Is pH monitored continuously?
If yes, how often is the meter calibrated?

Y N

weekly. Start calibration log

31. Does the facility collect its own samples?
If no, specify the sample collector:

Y N

- 32. Are appropriate sampling procedures followed?
- Monitoring frequencies
- Sample collection (grab for pH, O&G, CN, phenols, VOCs)
- Flow proportioned samples
- Proper preservation techniques
- Sample holding times
- Chain-of-custody forms

Y N
 Y N
 Y N
 Y N
 Y N
 Y N

33. Are samples analyzed in accordance with 40 CFR 136?

Y N

34. Laboratory conducting analyses:

Alloway Environmental

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility?
If yes, identify organics:

Y N

36. Does the facility have a current toxic organic management plan(TOMPI)?

NA Y/N

If yes, is it being implemented?

Y/N

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain:

Y N

38. Does the facility need a spill prevention plan or slug discharge control plan?

Y/N

If yes, does the facility have a written plan?

Y/N

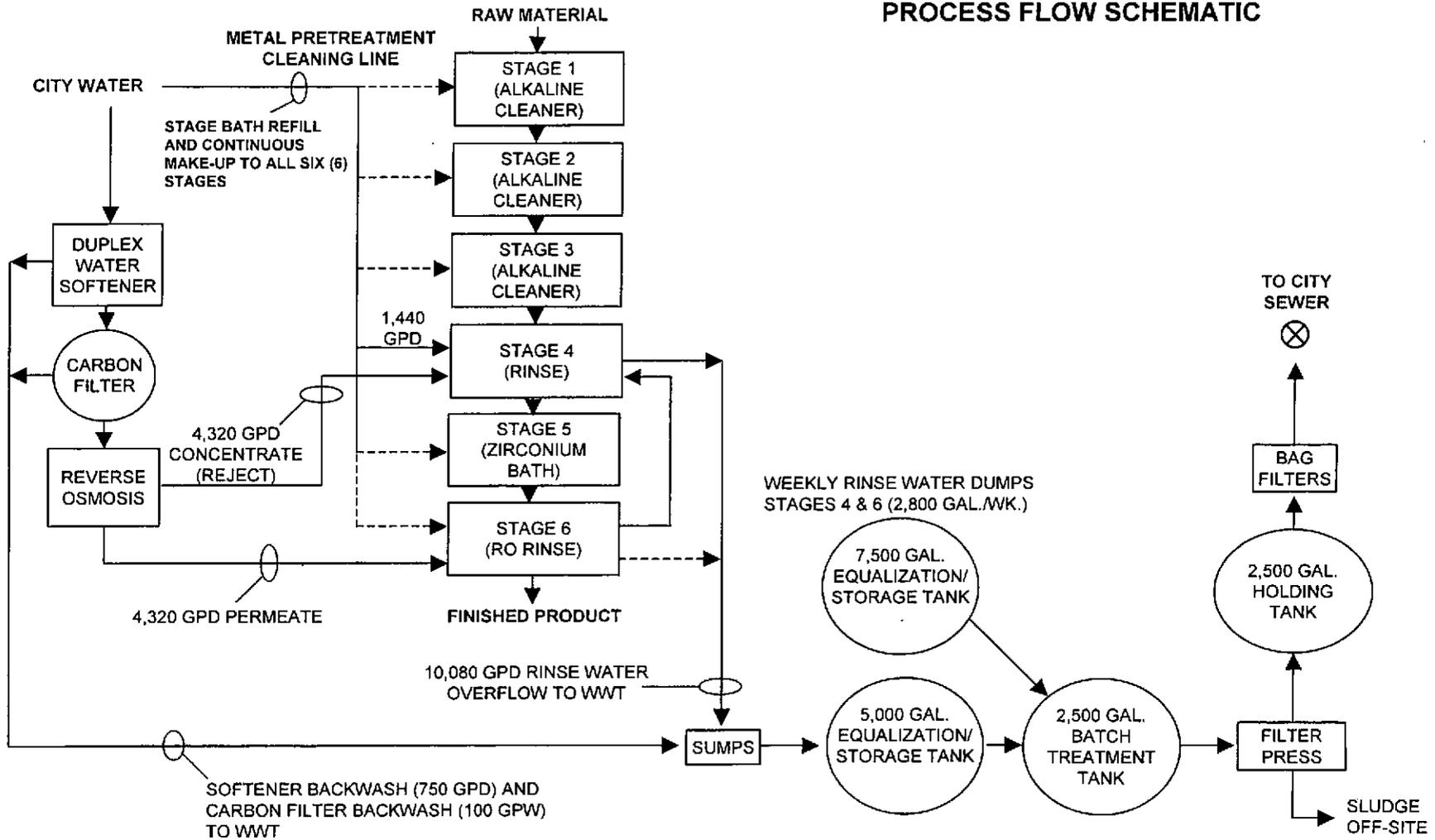
39. Identify any potential slug load or spill areas:

Gas & Diesel tanks are stored outside for fueling of vehicles. Valve has been removed from diesel tank and needs to be replaced. Indoor oil storage has secondary containment.

REQUIRED FOLLOW-UP ACTIONS

See Notes on page 1.

PROCESS FLOW SCHEMATIC



<p>SANITARY SEWER INDIRECT DISCHARGE PERMIT APPLICATION</p>	<p>PROCESS / FLOW SCHEMATIC 4/15/2007</p>
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