



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Putnam County
Whirlpool
Pretreatment

August 5, 2010

Mr. Glenn Kaufman
Whirlpool Corporation
Ottawa Division
P. O. Box 310
Ottawa, Ohio 45875

Dear Mr. Kaufman:

On July 14, 2010, an inspection was conducted at Whirlpool, 677 Woodland Drive, Ottawa, Putnam County. You were present and provided information on the operations and maintenance at the plant. Jason Phillips and Doug Schroeder from the Village of Ottawa WWTP were also present for the inspection.

The change from the 5 stage iron-phosphate washing system to the 4 stage zirconium phosphate washing system was observed. The new system consists of; stage 1 a 4,780 gallon alkaline cleaner tank, stage 2 a 2,250 gallon city water rinse tank, stage 3 a 4,780 gallon zirconium tank and stage 4 a 840 gallon city water rinse tank. Stages 2 and 4 have a continuous overflow to the Ottawa WWTP. The dumps from the washing tanks are being hauled off site for treatment and disposal. In the previous iron-phosphate system, dumps from the washing tanks were sent to a pH adjustment/settling batch tank prior to discharge to the WWTP. The pretreatment batch tank has been removed. If the facility changes the current operation of the 4 stage system and wants to discharge the washing dump water to the Ottawa WWTP then a Permit to Install (PTI) would need to be obtained for a new pretreatment system.

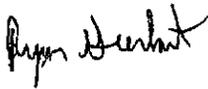
For the E-coat line pretreatment system the paint from the E-coat process is sent to a detackifier tank. From there the liquid waste is sent to a wastewater holding tank. Wastewater from the stage 1 and stage 2 tanks goes into the cleaner dump tank where sulfuric acid is added. An oil skimmer follows, and the skimmed oil is placed in a storage drum. The wastewater is then discharged to the wastewater holding tank, which also accepts the paint wastewater. The combined wastewater is then sent through pH adjustment tanks where sulfuric acid and caustic soda are added along with calcium chloride and 5729 demulsifier. The liquid then passes through a flash tank, where a coagulant is added. The solids are settled out in a clarifier and the wastewater then flows into a dwell tank. The solids are sent to a filter press and taken to a land fill. The wastewater is sampled at the dwell tank and discharged to the Ottawa WWTP.

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A review of the discharge monitoring reports (DMRs) from March 2008, to July 2010, shows that there have been several effluent violations for zinc. The violations are attached on a separate sheet. August Mack Environmental submitted a letter dated March 2, 2010, for the January Zinc violation stating that the elevated concentration was caused by an improper balance between the treatment system flow rate and the treatment chemical usage rate.

If you have any questions, please contact me at (419) 373-3053.

Sincerely,



Ryan Gierhart
Division of Surface Water

//lr

Enclosure

pc/w encl: Ryan Laake, DSW, CO
Doug Schroeder
DSW-NWDO File

Get New Data:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2DP00047*CP		101	01092	Zinc, Total (Zn)	30D Conc	1480	2400.	5/1/2010
2DP00047*CP		102	01092	Zinc, Total (Zn)	1D Conc	2610	4385.	1/26/2010
2DP00047*CP		102	01092	Zinc, Total (Zn)	30D Conc	1480	4385.	1/1/2010



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME WG Wood Company Inc. Whirlpool Corporation		PERMIT NUMBER 2DP00047	FACILITY NUMBER OHP000166
INSPECTION TYPE Recon	INSPECTOR Ryan Gierhart	FACILITY TYPE Significant Industrial User	DATE CONDUCTED 07/14/2010

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY Whirlpool Corporation
MAILING ADDRESS OF FACILITY Whirlpool Corporation Ottawa Division P.O. Box 310 Ottawa, Ohio 45875
CONTACT (NAME/TITLE/PHONE) Glenn Kaufman/Engineering Manager/419-523-9663 ext. 106

FACILITY EVALUATION				
(S = Satisfactory, M = Marginal, U = Unsatisfactory)				
	M	Pretreatment		
* See inspection letter				

Names(s) and Signature(s) of Inspector(s) <i>Ryan Gierhart</i> Ryan Gierhart	Agency / Office / Telephone Ohio EPA, NWDO, 419-373-3053	Date 8-4-10 December 24, 2009
Signature of Reviewer <i>Elizabeth A. Wick</i> Elizabeth A. Wick, P.E.	Ohio EPA, NWDO, 419-373-3002	Date 7/21/10 December 24, 2009

INDUSTRIAL USER INSPECTION CHECKLIST

Facility:	Whirlpool Corporation	Date of inspection: 7/14/2010
OH Number:	OHP000166	IDP Number: 2DP00047*CP
Facility Representative:	Glenn Kaufman	Inspector(s): Ryan Gierhart

COMPLIANCE

1. Date of last pretreatment inspection: 03/12/2008

2. Has the facility been in compliance with its permit limits since the last inspection?
If no, explain: Violations for Zinc in January and May of 2010. The violations are attached N

3. Is the facility in compliance with all other requirements?
Sampling procedures Y
Reporting (late reporting, failure to report, etc) Y
Compliance schedules NA
Submitted BMR and 90 day compliance reports NA
Any other requirements 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?
Explain any unresolved actions: N

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 200
6. Shifts/Day: 1/5 days/week

7. Production Days/Year: 260
8. Hours/shift: 8

9. Any production changes since the last inspection? Y
If yes, explain: **A new chest freezer line was added and a Zirconium Phosphate washer line was added.**

10. General facility description and operations:
Manufacturer upright freezers. Washes steel frames in zirconium phosphate and powder coats. Uses electrodeposition (e-coat) on evaporator shelves and other small parts

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

12. Any expansion or production increase expected within the next year?
If yes, explain: **May see an increase in production that results in a 2nd work shift.** Y

WASTEWATER TREATMENT

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

14. Was a PTI issued for the treatment system? Y

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

The pH adjustment tank has been removed for the zirconium phosphate cleaning system, previously the iron phosphate system had the dumps from the iron phosphate tank and acid tank go through the pH adjustment tank prior to discharge to the wwtp. Currently, the dumps from the zirconium phosphate tank and the alkaline cleaner tank are being hauled off-site. The two rinse water tanks continuously overflow to the wwtp.

If yes, was a PTI obtained? N

PTI Number: Date:

16. What is the treatment mode of operation? Batch / Continuous / **Combination**

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

18. How often is the treatment system checked?

The system is inspected and operated daily when plant is in operation.

19. Is there an alarm system for the system? Y
Explain: **E-coat-yes/ Iron-Phosphate-no**

20. Is there an operations and maintenance manual? Y

21. Is an inventory of critical spare parts maintained? Y
If yes, list: **Pumps, pH meters, pH probes, hoses, test equipment**

22. Are there any bypasses in the system? N
If yes, describe the location:

Have bypasses occurred since the last inspection? N/A

Was the POTW notified? N/A

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated?

Y

Method of disposal:

Landfill

Frequency and amount of disposal:

E-coat – 24 cu. Yd – once a week

Iron-phosphate – 8 cu. Yd – once a week

Name of hauler/landfill/disposal facility:

Allied Waste Services – Northwood, Ohio

Is any sludge generated subject to RCRA regulations?

N

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

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
1. E-Coat			2,880		
2. Iron-Phosphate			9,600		
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow					
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary Approx.			7,260		
TOTAL FLOW			19,740		

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

SELF MONITORING

26. Sample location(s) described in the facility's permit: Y
27. Is the facility sampling at the location(s) described in the permit?
If no, describe the actual location: Y
28. Is the location(s) where the facility is sampling representative?
If no, indicate a representative location: Y
29. Is the flow measured or estimated? Measured / Estimated
- If measured, how often is the meter calibrated?
- If estimated, describe method of estimation:

- | | |
|--|---|
| 30. Is pH monitored continuously?
E-Coat continuously/Zirconium-phosphate when sampled
If yes, how often is the meter calibrated? | N |
| 31. Does the facility collect its own samples?
If no, specify the sample collector: | Y |
| 32. Are appropriate sampling procedures followed? | Y |
| Monitoring frequencies | Y |
| Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) | Y |
| Flow proportioned samples | N |
| Proper preservation techniques | Y |
| Sample holding times | Y |
| Chain-of-custody forms | Y |
| 33. Are samples analyzed in accordance with 40 CFR 136? | Y |
| 34. Laboratory conducting analyses:
Bookside-New Knoxville | |

TOXICS MANAGEMENT

- | | |
|--|------------|
| 35. Are any listed toxic organics used in the facility?
If yes, identify organics: | N |
| 36. Does the facility have a current toxic organic management plan(TOMP)?
If yes, is it being implemented? | N/A
N/A |
| 37. Has the facility had any uncontrolled releases or spills to the POTW since
the previous inspection? If yes, please explain: | N |
| 38. Does the facility need a spill prevention plan or slug discharge control plan?
If yes, does the facility have a written plan? | Y
Y. |
| 39. Identify any potential slug load or spill areas: | |

REQUIRED FOLLOW-UP ACTIONS
