

Ohio

Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Notice of Violation  
Putnam County  
Production Products, Inc.  
Pretreatment

February 18, 2011

Mr. Adam Bates  
Production Products, Inc.  
200 Sugar Grove Lane  
Columbus Grove, Ohio 45830

Dear Mr. Bates:

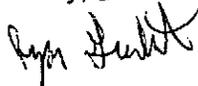
On February 10, 2011, an inspection of the pretreatment system serving Production Products Inc. (PPI) in Columbus Grove was conducted. Jessica Heitman and I represented the Ohio EPA. You were present and provided information on the wastewater generating processes and the oil/water separator.

The facility has a conveyor system installed in trenches below grade. Oil accumulates on the ground of the trench. Water is used to wash the area and is drained to a sump pit. This water is then pumped to a tote. The facility collects a majority of its waste water in totes that are shipped off site. The dye wash station is the main source of flow discharged through the oil/water separator to the Columbus Grove Waste Water Treatment Plant.

A review of the Discharge Monitoring Reports (DMRs) for September 2010, to February 2011, shows that the facility had several indirect discharge permit (IDP) effluent limit violations. The specific instances of non-compliance are attached on a separate sheet.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please contact me at (419) 373-3053.

Sincerely,



Ryan Gierhart  
Division of Surface Water

/llr

Enclosure

pc w/ enclosure:

Jeff Vance  
~~DSW-NWDO-File~~  
Ryan Laake, DSW, CO

60 New Data

| Permit No   | Reporting Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|----------------|-----------|------------|-------|----------------|----------------|
| 2DP00079*AP |                  | 001     | 00400          | pH        | 1D Conc    | 9.0   | 9.6            | 8/1/2010       |
| 2DP00079*AP |                  | 001     | 00400          | pH        | 1D Conc    | 9.0   | 9.1            | 10/29/2010     |
| 2DP00079*AP |                  | 001     | 00400          | pH        | 1D Conc    | 9.0   | 9.7            | 12/16/2010     |

**INDUSTRIAL USER INSPECTION CHECKLIST**

Facility: **Production Products Inc.** Date of inspection: **02/10/2011**  
OH Number: **OHP000222** IDP Number: **2DP00079\*AP**  
Facility Representative: **Adam Bates** Inspector(s): **Ryan Gierhart**

**COMPLIANCE**

- 1. Date of last pretreatment inspection: 8/26/2009
- 2. Has the facility been in compliance with its permit limits since the last inspection? N  
If no, explain: Several pH limit violations
- 3. Is the facility in compliance with all other requirements? Y  
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? N  
Explain any unresolved actions:

**FACILITY OPERATIONAL CHARACTERISTICS**

- 5. Number of Employees: **60**
- 6. Shifts/Day: **2**
- 7. Production Days/Year: **260**
- 8. Hours/shift: **8**
- 9. Any production changes since the last inspection? Y  
If yes, explain: More robotic welders have been installed
- 10. General facility description and operations:  
**Metal Stamping facility and some welding operations.**
- 11. Any change in materials used in production since the last inspection? N  
If yes, explain:
- 12. Any expansion or production increase expected within the next year? N  
If yes, explain:

**WASTEWATER TREATMENT**

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

**From the Scale pits collect all the oil wastewater in a 500 gallon tank and ship it off site by Clean Water Limited. Dye wash area goes through 1500 gallon oil/water separator then is discharged to Columbus Grove WWTP.**

**They use signs to discourage dumping into the drains leading to the oil water separator and they monitor the tank volumes every 2 months to verify that wastewater is accumulating in the 500 gallon drum.**

14. Was a PTI issued for the treatment system? Y
15. Were there any modifications to the treatment system since the previous inspection? N
- If yes, was a PTI obtained? N/A
- PTI Number: \_\_\_\_\_ Date: \_\_\_\_\_

16. What is the treatment mode of operation? **Batch / Continuous / Combination**
- If batch, list the frequency and duration:

**Once a week dyes are washed.**

17. Who is responsible for operating the treatment system?

**Bryan Settlemyre - maintenance**

18. How often is the treatment system checked?

**Every 2 Months a sample is sent out**

19. Is there an alarm system for the system? N  
Explain: \_\_\_\_\_
20. Is there an operations and maintenance manual? N
21. Is an inventory of critical spare parts maintained? N/A  
If yes, list: \_\_\_\_\_
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?

N

**Very low volume of solids generated**

Method of disposal:

**Shipped off site**

Frequency and amount of disposal:

**Every 3 months**

Name of hauler/landfill/disposal facility:

**Clean Water Limited**

Is any sludge generated subject to RCRA regulations?

N

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

N/A

**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. Dye Wash Water                   |                 |                       | 300     |                                 |         |
| 2. Floor Scrubbings                 |                 |                       |         |                                 |         |
| 3. Air Dryer Condensate             |                 |                       |         |                                 |         |
| 4. Compressor Condensate            |                 |                       |         |                                 |         |
| 5. Floor Drains in Receiving        |                 |                       |         |                                 |         |
| 6.                                  |                 |                       |         |                                 |         |
| 7.                                  |                 |                       |         |                                 |         |
| 8.                                  |                 |                       |         |                                 |         |
| 9.                                  |                 |                       |         |                                 |         |
| 10.                                 |                 |                       |         |                                 |         |
| <b>Total Regulated Process Flow</b> |                 |                       |         |                                 |         |
| Non-contact Cooling                 |                 |                       |         |                                 |         |
| Blowdown                            |                 |                       |         |                                 |         |
| Reverse Osmosis Condensate          |                 |                       |         |                                 |         |
| Demineralizer Regeneration          |                 |                       |         |                                 |         |
| Filter Backwash                     |                 |                       |         |                                 |         |
| Compressor Condensate               |                 |                       |         |                                 |         |
| Storm Water                         |                 |                       |         |                                 |         |
| Other Dilute Flows                  |                 |                       |         |                                 |         |
| Unregulated Flows (provide list)    |                 |                       |         |                                 |         |
| Sanitary Approx. 100 Employee       |                 |                       |         |                                 |         |
| <b>TOTAL FLOW</b>                   |                 |                       |         |                                 |         |

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

**SELF MONITORING**

26. Sample location(s) described in the facility's permit:  
**Manhole next to office building, which is downstream of the oil water separator**

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

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

29. Is the flow measured or estimated? Measured / Estimated

If measured, how often is the meter calibrated?

If estimated, describe method of estimation:  
**Production Rates and Population on site. Based on time to wash dyes.**

- |  |   |
|--|---|
| 30. Is pH monitored continuously?<br>If yes, how often is the meter calibrated?        | N |
| 31. Does the facility collect its own samples?<br>If no, specify the sample collector: | Y |
| 32. Are appropriate sampling procedures followed?                                      |   |
| 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   | N |
| Chain-of-custody forms   | Y |
| 33. Are samples analyzed in accordance with 40 CFR 136?                                | N |
| 34. Laboratory conducting analyses:<br><b>Alloway</b>                                  |   |

|                          |
|--------------------------|
| <b>TOXICS MANAGEMENT</b> |
|--------------------------|

- |  |            |
|--|------------|
| 35. Are any listed toxic organics used in the facility?<br>If yes, identify organics:  | N          |
| 36. Does the facility have a current toxic organic management plan(TOMP)?<br>If yes, is it being implemented?                        | N/A<br>N/A |
| 37. Has the facility had any uncontrolled releases or spills to the POTW since<br>the previous inspection? If yes, please explain:   | N          |
| 38. Does the facility need a spill prevention plan or slug discharge control plan?<br>If yes, does the facility have a written plan? | Y<br>Y     |
| <b>They do train employees and new hires for 60 days after a change is made to the plan.</b>   |            |

39. Identify any potential slug load or spill areas:  
**The detergent storage container in the dye wash area. The oil storage area next to the drain on the outside of the building.**

|                                   |
|-----------------------------------|
| <b>REQUIRED FOLLOW-UP ACTIONS</b> |
|-----------------------------------|

There is concern that proper holding times are being maintained for the pH monitoring. The facility should perform the pH monitoring onsite. 40 C.F.R. 136.3 states that the holding time for pH is 15 minutes.