



Environmental  
Protection Agency

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

Re: Putnam County  
Production Products, Inc.  
Pretreatment

October 12, 2011

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

Dear Mr. Bates:

On September 28, 2011, an inspection of the pretreatment system serving Production Products Inc. (PPI) in Columbus Grove was conducted. You and Renee Guay 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 for offsite disposal. The dye wash station and floor scrubbing wastewater are the main sources of flow discharged through the oil/water separator to the Columbus Grove Waste Water Treatment Plant. Dyes are washed approximately once per week in the wash station area. The dye wash water and the floor scrubbing wastewater flow into the screened catch basin that discharges to the oil/water separator.

A review of the Discharge Monitoring Reports (DMRs) for February 2011, to August 2011, shows that there have been no effluent limit violations. It was noted that due to a change in staffing EDMR data has not been submitted for the last three (3) months. The facility is working on establishing an employee in the EDMR system to submit the data. The data that was provided during the inspection showed that there was a violation for pH in the month of August.

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, Columbus Grove WWTP  
DSW-NWDO File  
Ryan Laake, DSW-CO

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: Production Products Inc. Date of inspection: 09/28/2011
OH Number: OHP000222 IDP Number: 2DP00079\*AP
Facility Representative: Adam Bates/Renee Guay Inspector(s): Ryan Gierhart

COMPLIANCE

- 1. Date of last pretreatment inspection: 02/10/2011
2. Has the facility been in compliance with its permit limits since the last inspection? N
If no, explain: pH limit violation in August 2011 of 12.2. The violation is believed to be from an increase in washing of the dyes. More dyes were used because several new stamping products were being tested.
3. Is the facility in compliance with all other requirements? Y
Sampling procedures N
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:
The facility did not submit DMR data for the last 3 months. There has been a change in staffing and they are working on establishing an employee in the EDMR system to submit the data.

- 4. Was the facility required to perform any actions as a result of the last inspection? Y
Explain any unresolved actions: The facility noted that they have purchased a pH meter to take samples within the required holding time. The pH meter was not on location. It was noted the pH meter is shared between PSI and PPI and was being stored at PSI.

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? N
If yes, explain:
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? Y
If yes, explain: There is discussion of adding on to their existing facility and adding more stamping and welding operations.

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 Safety Clean. 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?

**Maintenance Department**

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:

**Safety Clean**

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			400		
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. The sanitary sewer ties into the same manhole. The approved PTI shows that the manhole(#3) installed prior to the sanitary line tying in. It was discussed that the process water sample needs to be separated from the sanitary wastewater. It was noted that the facility will look at installing a sampling port to isolate the process water.**

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   | Y |
| Chain-of-custody forms   | Y |
| 33. Are samples analyzed in accordance with 40 CFR 136?                                | Y |
| 34. Laboratory conducting analyses:<br>Alloway   |   |

**TOXICS MANAGEMENT**

- |  |            |
|--|------------|
| 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     |

**They do train employees and new hires for 60 days after a change is made to the plan.**

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.**

**REQUIRED FOLLOW-UP ACTIONS**

**The process wastewater needs to be sampled prior to mixing with the sanitary waste.**