Ohio | Environmental Protection Agency

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

October 7, 2011

Mr. Joseph Clark
Bridgestone APM Company
P .O. Box 450
Upper Sandusky, Ohio 43351

Dear Mr. Clark:

On September 19, 2011, a Pretreatment Industrial User Inspection was conducted at your Upper Sandusky facility. This facility is located on 235 Commerce Way, Upper Sandusky, Ohio. Mr. Tate Tyson, Mr. Andy Shepherd and Mr. Bryan Welty were present and provided information regarding the operation of the facility.

Process wastewater is generated from the spent chemicals and general rinses from the zinc phosphate process. The pretreatment system consists of three dump tanks, two neutralization reactors (in series), a Lamella clarifier, a final monitoring tank, a sludge thickener tank and a filter press. The discharge from the monitoring tank is collected and sampled prior to discharge into the city sanitary sewer. The sludge is being disposed of at a solid waste landfill.

Please note that your Indirect Discharge Permit (IDP) became effective on November 1, 2006, and will expire on October 31, 2011. We are also in the process of renewing your existing IDP. In the event that you do not receive your renewed IDP by that date, please continue to monitor your facility per your expired IDP.

A completed inspection report is included for your review. If you have any questions, please call.

Sincerely,

Jason Ko
Division of Surface Water

/llr

pc: Ryan Laake, DSW, CO
Aaron Putnam, City of Upper Sandusky
DSW-NWDO File

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

PRETREATMENT INSPECTION REPORT

NPDES Permit Number	Facility Permit Number	Date Conducted
OHP000019	2DP00056	9/19/2011

Inspection Type	Inspector	Facility Type	Time In	Time Out
C	S	I	9:15 a.m.	10:30 a.m.

GENERAL INFORMATION

Name and Location of Facility
Bridgestone AMP Company
235 Commerce Way
Upper Sandusky, Ohio 43351

POTW Receiving Discharge
Upper Sandusky POTW

Mailing Address of Facility

Bridgestone AMP Company
P O Box 450
Upper Sandusky, OH 43351

Categorical Standard(s) or Other Classification

Contact (Name/Title/Phone)

Tate Tyson, Environmental Safety/Health Coordinator (419) 294-6989
Bryan Welty, Process Engineer (419) 294-6989
Andy Shepherd, Plant Safety Facilitator (419) 294-6989

FACILITY EVALUATION (S = Satisfactory, M = Marginal, U = Unsatisfactory)

S Pretreatment
S Chemical Storage
S Site/Facility Review
S Self-monitoring

Jason Ko
Name and Signatures of Inspector
Date
Ohio EPA, NWDO, (419) 352-8461

Elizabeth A. Wick, P.E 10/4/11
Signature of Reviewer
Date
Ohio EPA, NWDO, (419) 352-8461

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: Bridgestone AMP Company | Date of inspection: 9/19/2011

OH Number: OHP0000019 | IDP Number: 2DP00056

Facility Representative:Tate Tyson, Andy Shepherd & Bryan Welty | Inspector(s): Jason Ko

COMPLIANCE

1. Date of last pretreatment inspection: 8/19/2009

2. Has the facility been in compliance with its permit limits since the last inspection? (Y) /N
   If no, explain:

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

Sampling procedures	(Y) / N / NA
Reporting (late reporting, failure to report, etc)	(Y) / N / NA
Compliance schedules	Y / N / (NA)
Submitted BMR and 90 day compliance reports	(Y) / N / NA
Any other requirements	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:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 475
6. Shifts/Day: 3
7. Production Days/Year: 350
8. Hours/shift: 8
9. Any production changes since the last inspection? Y / (N)

   If yes, explain:

10. General facility description and operations:

    Facility performs zinc phosphating of metal automotive parts for various customers

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

12. Any expansion or production increase expected within the next year? Y / (N)
If yes, explain:

Same

WASTEWATER TREATMENT

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

Spent Alkaline, Spent Acid & General Rinse Collection Tanks* - Neutralization Tanks (add caustic soda/sulfuric acid/cationic polymer) - Lamella Clarifer (add anionic polymer)

-------- Monitoring Sample - City Sewer

------ Sludge Thickener - Filter Press - Landfill

*Supernatant from the thickner and filtrate water from the press will be pumped to the general collection tank (T1)

14. Was a PTI issued for the treatment system? 10/13/2000 (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:

17. Who is responsible for operating the treatment system?
Bryan Welty and floor operator

18. How often is the treatment system checked?
At least 4 times/Daily

19. Is there an alarm system for the system? (Y) / N
Explain:
Level & pH alarms

20. Is there an operations and maintenance manual? (Y) / N

21. Is an inventory of critical spare parts maintained? (Y) / N
If yes, list: Pumps

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

Have bypasses occurred since the last inspection? Y / (N)

Was the POTW notified? Y / N

23. Are residuals or sludges generated? (Y) / N

Method of disposal: Landfill

Frequency and amount of disposal: about 1/week (~ ½ cubic yard)

Name of hauler/landfill/disposal facility: Environmental of Wyandot Landfill

Is any sludge generated subject to RCRA regulations? Y /(N)

If land applying sludge, is there a sludge management plan? 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
Phosphating Process			15,000		
Filter Backwash			25		
Total Regulated Process Flow					
Noncontact Cooling					
Blowdown			10		
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm water					
Other Dilute Flows					
Unregulated Flows(provide list)					
Sanitary					
TOTAL FLOW			15,035		

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

NONE

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

    A monitoring tank after the Lamella Clarifer

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

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

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

    If measured, how often is the meter calibrated?

    Flow Meter was calibrated 6/24/2009

    If estimated, describe method of estimation:

30. Is pH monitored continuously? Y / (N)
    If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? (Y) /N
    If no, specify the sample collector:

32. Are appropriate sampling procedures followed?

Monitoring frequencies	(Y) / N
Sample collection (grab for pH, O&G, CN, phenols, VOCs)	(Y) / N
Flow proportioned samples	(Y) / N
Proper preservation techniques	(Y) / N
Sample holding times	(Y) / N
Chain-of-custody forms	(Y) / N

33. Are samples analyzed in accordance with 40 CFR 136? (Y) / N

34. Laboratory conducting analyses:

    Alloyway
    1776 Marion- Waldo Road
    Marion, Ohio 43302

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / (N)
If yes, identify organics:

36. Does the facility have a current toxic organic management plan (TOMP)? Y /(N)
If yes, is it being implemented?
Chooses to monitor TTOs 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? SPCC last updated 9/16/2002 Y / N

39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS