



Environmental
Protection Agency

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

Re: Auglaize County
Omni Manufacturing, Inc.
Pretreatment

October 6, 2011

Ms. Pamela Brown, Safety Director
Omni Manufacturing, Inc.
P.O. Box 179
St. Marys, Ohio 45885

Dear Ms. Brown:

On September 27, 2011, an inspection was conducted at Omni Manufacturing, Inc. 901 McKinley Road, St. Marys, Auglaize County. You and Mr. Mick Teman were present and provided information on the operations and maintenance at the plant. Mr. David Sprague and Mr. Jeff Thompson of the City of St. Marys were also present during the inspection. The inspection included a tour of the facility and completion of the enclosed checklist.

All process wastewater is generated from a five stage wash and coating system and a parts washer. The wash and coating system is surrounded by a containment holding tank. This tank is manually discharged to a second holding tank underground. From this tank it is discharged to the City of St. Marys sewer system. The parts washer is discharged to the same underground holding tank as the wash and coating system. A detailed description of the wash system can be found on the second page of the enclosed checklist.

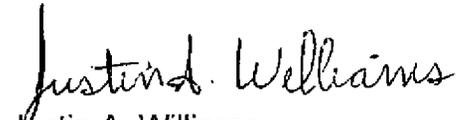
As discussed during the inspection, the City's proposed pretreatment program has been reviewed by Ohio EPA and found to be acceptable. Once the City's program becomes effective, the City will issue a discharge permit to the industries within their jurisdiction that require a permit. Once those permits are effective, we will revoke our indirect discharge permit. You will receive a letter indicating the effective date of our permit revocation. You are still responsible for meeting all requirements of our permit until the effective date of the revocation, including all sampling and reporting requirements. The City will also be conducting compliance inspections and sampling of the industries within their jurisdiction. Once the City's discharge permit becomes effective, you will be required to follow the conditions of that permit and will need to report sample results directly to the City.

Ms. Pamela Brown, Safety Director
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There will likely be an overlap period in which you will need to report sample results to both the City and to Ohio EPA.

If there are any questions, please call me at (419) 373-3022.

Yours truly,



Justin A. Williams
Division of Surface Water

/llr

Enclosure

Pc w/Enclosure: Mr. David Sprague, City of St.Marys
Mr. Ryan Laake, DSW-CO
DSW-NWDE File

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Omni Manufacturing, Inc.**

Date of inspection: **09/27/2011**

OH Number: **OHP000112**

IDP Number: **2DP00037**

Facility Representative: **Pamela Brown**

Inspector(s): **Justin A. Williams**

COMPLIANCE

1. Date of last pretreatment inspection: **08/19/2009**

2. Has the facility been in compliance with its permit limits since the last inspection? **No**
If no, explain: **Two effluent violations for zinc in October 2009.**

3. Is the facility in compliance with all other requirements?
Sampling procedures **Yes**
Reporting (late reporting, failure to report, etc) **Yes**
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? **No**
Explain any unresolved actions:

None

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **119**
6. Shifts/Day: **3**

7. Production Days/Year: **252**
8. Hours/shift: **8**

9. Any production changes since the last inspection? **Yes**
If yes, explain:
Production increase

10. General facility description and operations:

Facility mainly produces automotive parts. Also produces institutional door frames and does miscellaneous agricultural parts coating.

Notes:

Washing and Coating Process:

- Stage 1: Alkaline Cleaner (Parco Cleaner 305).
- Stage 2: City Water Rinse.
- Stage 3: City Water Rinse.
- Stage 4: Nano-ceramic coating.
- Stage 5: City Water Rinse.

Parts Washer:

The process consists of a washing unit that contains a rust inhibitor (AT-30). The unit drains to an underground holding tank. About 150 gallons of wash water is drain once every week or every two weeks. The holding tank discharges to the City sanitary sewer.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection?
If yes, explain: **No**
12. Any expansion or production increase expected within the next year?
If yes, explain: **No**

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:
A new drawing was submitted during this inspection.
14. Was a PTI issued for the treatment system? **Yes**
15. Were there any modifications to the treatment system since the previous inspection? **No**
If yes, was a PTI obtained? **NA**
PTI Number: _____ Date: _____
16. What is the treatment mode of operation?
Continuous
If batch, list the frequency and duration:
17. Who is responsible for operating the treatment system?
Tom Silone, Paint Line Supervisor
18. How often is the treatment system checked?
Twice daily

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system **No**
Explain: **Technician and supervisor monitor equipment and keep a log of activities. Area has containment around it.**
20. Is there an operations and maintenance manual? **Yes**
21. Is an inventory of critical spare parts maintained? **Yes**
If yes, list:
Back up parts onsite.
22. Are there any bypasses in the system? **No**
If yes, describe the location:
- Have bypasses occurred since the last inspection? **NA**
- Was the POTW notified? **NA**
23. Are residuals or sludges generated? **Yes**
Method of disposal:
Landfill
- Frequency and amount of disposal:
Solids from tank removed every 3 years.
- Name of hauler/landfill/disposal facility:
Waste Management - Lima
- Is any sludge generated subject to RCRA regulations? **No**
- If land applying sludge, is there a sludge management plan? **NA**

SELF MONITORING

26. Sample location(s) described in the facility's permit:
Clean out riser pipe in yard.
27. Is the facility sampling at the location(s) described in the permit? **Yes**
If no, describe the actual location:
28. Is the location(s) where the facility is sampling representative? **Yes**
If no, indicate a representative location:
29. Is the flow measured or estimated? **Flow for facility is estimated (calculated) using Incoming City water flow rate.** **Measured**
If measured, how often is the meter calibrated?
City flow meter is calibrated once every 5 to 7 years.
30. Is pH monitored continuously? **No**
If yes, how often is the meter calibrated?
Test and adjust pH when discharging batch tanks.
31. Does the facility collect its own samples? **No**
If no, specify the sample collector:
Collect for pH. Alloway also collects pH and all other samples.
32. Are appropriate sampling procedures followed?
Monitoring frequencies **Yes**
Sample collection (grab for pH, O&G, CN, phenols, VOCs) **Yes**
Flow proportioned samples **Yes**
Proper preservation techniques **Yes**
Sample holding times **Yes**
Chain-of-custody forms **Yes**
33. Are samples analyzed in accordance with 40 CFR 136? **Yes**
34. Laboratory conducting analyses:
Alloway - Lima.

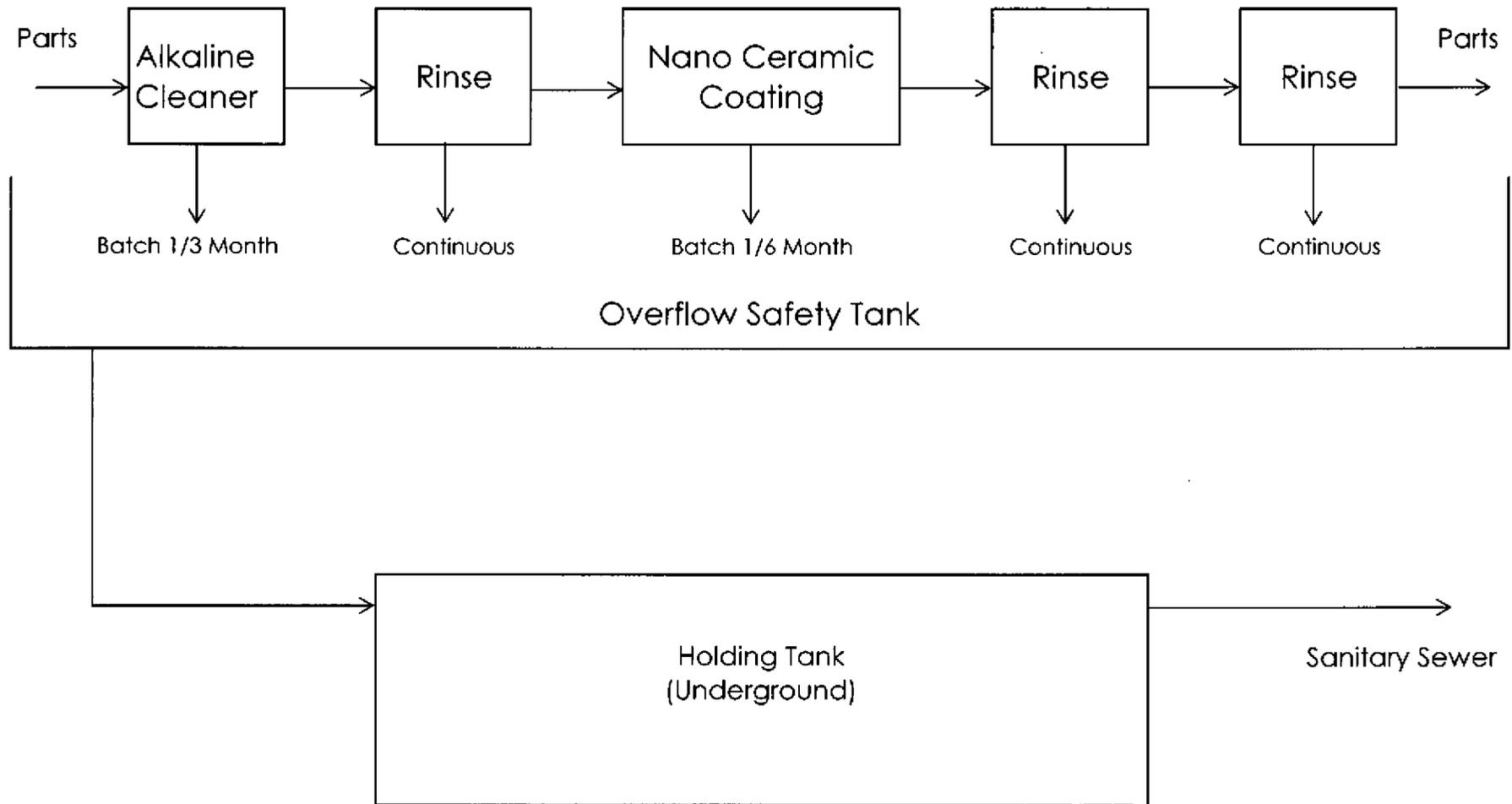
TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? **No**
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? **Yes**
If yes, is it being implemented? **Yes**
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: **No**
38. Does the facility need a spill prevention plan or slug discharge control plan? **Yes**
If yes, does the facility have a written plan? **Yes**
39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS



Omni Manufacturing, Inc. Process Flow Chart





MATERIAL SAFETY DATA SHEET



AT-30 Corrosion Inhibitor

SECTION 1

Product and Company Information

Product Identifier METAL MATES AT-30 Corrosion Inhibitor
Product use Corrosion Inhibitor
Manufacturer ITW ROCOL North America
3624 West Lake Avenue
Glenview, Illinois 60026
1-800-452-5823
Emergency info After 5:00pm CST: CHEMTREC, 1-800-424-9300

SECTION 2

Hazards Identification

Emergency overview No hazards resulting from the material supplied.
HMIS rating
Health 1
Flammability 0
Reactivity 0
Personal protection B
Routes of entry Skin, eyes, respiratory tract, digestive system.
Potential short-term health effects
Skin May cause mild irritation.
Eyes May cause mild irritation.
Inhalation May cause irritation to eyes, nose and throat. May cause headache, dizziness and drowsiness.
Ingestion Harmful if swallowed. May cause irritation of the stomach.
Potential long-term health effects None identified

SECTION 3

Chemical Composition/Hazardous Ingredients

Ingredients	CAS #	% by weight	OSHA/PEL (TWA)	ACGIH/TLV (TWA)
Alkanolamine	00102-71-6	21		5 mg/m ³



SECTION 4**First Aid Measures**

Skin contact	Immediately wash the exposed area thoroughly with soap and water. Remove contaminated clothing. Wash before reuse. If irritation persists, consult physician.
Eye contact	In case of contact, immediately flush with water for at least 15 minutes. If irritation persists, consult physician.
Inhalation	If inhaled, move to fresh air. If irritation persists, consult physician.
Ingestion	If swallowed, DO NOT induce vomiting. Obtain medical attention immediately.

SECTION 5**Fire Fighting Measures**

Flammability	Not a flammable product. However, may burn if heated to extreme temperatures. Refer to flash point.
Products of combustion	Oxides of carbon (CO, CO ₂) and nitrogen (NO, NO ₂ , ect.).
Flash point (method)	> 200°F (93°C) (COC)
Explosion data	
Sensitivity to mechanical impact	None
Sensitivity to static discharge	None
Oxidizing properties	None
Fire-fighting media and instructions	In case of fire, use carbon dioxide, dry chemicals, foam, fog, sand, or earth.
Special fire-fighting procedures/equipment	Self contained breathing apparatus and protective clothing is recommended to protect fire fighters from any hazardous combustion or decomposition products. Pressure build-up in the closed container may occur due to heat exposure. Keep away from heat, sparks, flame or ignition sources.

SECTION 6**Accidental Release Measures**

Personal precautions	Use appropriate safety equipment. Avoid inhaling vapors or mist. Avoid contact with eyes, skin and clothing.
Environmental precautions	Do not allow spilled product to enter drains, sewers, or waterways.
Cleanup	Ventilate area. Eliminate all sources of heat and flame. Stop leak if safe to do so. Contain spill. Use absorbent material, such as vermiculite or sand. Place in suitable container for later disposal.
Prohibited materials	None

SECTION 7**Handling and Storage**

Handling	Use appropriate safety equipment. Use with adequate ventilation. Avoid contact with eyes, skin and clothing. Keep away from extreme heat. Keep container closed when not in use.
Storage	Store away from extreme heat, flame, or ignition sources. Pressure build up may occur due to heat exposure or temperature change. Release pressure by slowly opening container.



SECTION 8**Exposure Controls and Personal Protection**

Hygiene measures	Avoid contact with eyes, skin and clothing. Do not eat, drink, or smoke while handling this product.
Control measures	General ventilation should be sufficient. Providing approved respirators for emergencies, or when mist/vapor concentrations are unknown may be warranted. Availability of eye wash station, washing facilities and safety shower is recommended.
Personal protection	
Skin	Wear suitable glove. Neoprene gloves are recommended. Wear protective clothing suitable to prevent contact. Remove contaminated clothing and launder before wearing.
Eyes	Safety glasses are recommended.
Respiratory	Not normally required. Control vapor or mist concentrations below exposure limits through use of general or local exhaust ventilation.

SECTION 9**Physical and Chemical Properties**

Physical state	Liquid
Color	Clear, light amber
Odor	Amine odor
pH	8.0 – 9.0
Boiling point	> 200°F (93°C)
Melting/freezing point	Not available
Vapor pressure	Not available
Solubility in water	Soluble
Specific gravity	1.04
Vapor density	Not available
Volatile organic compounds	Not available

SECTION 10**Reactivity and Stability**

Stability and reactivity	Stable. Hazardous polymerization will not occur.
Conditions to avoid	Extreme heat. Do not heat about 140°F (60°C) in the presence of aluminum.
Materials to avoid	Strong oxidizers, strong alkalies, strong acids, acrylates, aldehydes, ketones, organic anhydrides, and organic halides.
Hazardous decomposition products	Thermal decomposition or burning will produce carbon monoxide, carbon dioxide, and nitrogen oxides.



SECTION 11 Toxicological Information

LD50	Not determined for the product Alkanolamine: 4920 µL/kg, approximately 5000 mg/kg (oral, rat); >16 mL/kg, approximately >16 g/kg (dermal, rabbit).
LC50	Not determined for the product
Carcinogenic	None of the ingredients in this product are listed by IARC, ACGIH, NTP or OSHA as carcinogenic.
Teratogenicity	No information
Mutagenicity	No information
Sensitization	Contains 21% alkanolamine, which may cause skin sensitization in a small portion of individuals.

SECTION 12 Ecological Information

Environmental toxicity	None reported
Aquatic toxicity	No data

SECTION 13 Disposal Considerations

Handling for disposal	Absorb on suitable material and follow procedures listed below.
Methods of disposal	Dispose of in a manner that is recommended by local, state, provincial and federal laws and regulations.

SECTION 14 Transportation Information

Not classified as hazardous for transport (TDG, CFR, IMO, ICAO).

SECTION 15 Regulatory Information

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and this MSDS contains all the information required by the CPR.

WHMIS information	Class D2B	
CEPA information	No data	
TSCA information	All ingredients are included in the TSCA inventory.	
SARA Title III	311/312: Immediate Health Hazard; Yes. Delayed Health Hazard; Yes.	

SECTION 16 Other Information

Prepared by	METAL MATES Inc., Leroy Hitchcock, 1-800-452-5823		
Date of issue	June 25, 2008	Date of previous issue	December 16, 2005

References

1. ACGIH, Threshold Limit Values for Chemical Substances and Physical Agents & Biological Exposure Indices, 2004.
2. Canadian Centre for Occupational Health and Safety. CCInfoWeb databases, 2004.
3. US EPA Title III Lists of Lists - October 2001 version.
4. Material Safety Data Sheets from manufacturer.

