



State of Ohio Environmental Protection Agency
Southwest District

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

December 20, 2007

Mr. Joseph Solimini
Formica Corporation
10155 Reading Road
Cincinnati, Ohio 45241

Re: Formica Corporation – CEI – OH0009296;1IQ00000*ED - Notice of Violation

Dear Mr. Solimini:

On November 29, 2007, Laura Pohlman and Marianne Piekutowski of this office met with Vanessa Peckinpaugh to conduct a NPDES compliance evaluation inspection (CEI) at the Formica Corporation facility in Cincinnati. The purpose of the inspection was to evaluate compliance with the terms of the NPDES. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached NPDES compliance inspection report, all areas that were rated received a satisfactory rating except for Effluent/Receiving Water which received a marginal and Compliance Schedule which received an unsatisfactory. The reasons for these ratings are provided in the attached report.

Thank you and your staff for the time extended during the inspection. If you have any questions, please contact Ms. Piekutowski at this office at 937.285.6108.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

Enclosure

Cc: Vanessa Peckinpaugh, Formica Corp.







State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11Q00000*FD	OH0009296	11/29/07	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Formica Corporation 10155 Reading Road Cincinnati, Ohio 45241-4805	12:15 pm	06/01/2006
	Exit Time	Permit Expiration Date
	1:45 pm	05/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Vanessa Peckinpaugh, EHS Manager	513.786.3273	
Name, Address and Title of Responsible Official	Phone Number	
Joe Solimini, Plant Manager Formica Corporation 10155 Reading Road Cincinnati, Ohio 45241-4805		

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	U	Compliance Schedule
N	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached sheets.

Inspector	Reviewer
12/20/07	12/21/07
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... NA
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

e) The facility received a PTI for the installation of dechlorination system. The facility currently evaluating whether or not this is a real violation or if this is interference. Sampling data has been submitted to Division of Environmental Services (DES) for evaluation. If this is truly a violation, then the system must be installed.

Section F: Permit Verification

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

a) The facility has not met the compliance dates contained in the facility's compliance schedule.
e) The TRC violations may be interference with the method. DES has been asked to evaluate this.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed NA
- (b) Adequate alarm system available for power or equipment failures.. NA
- (c) All treatment units in service other than backup units..... NA
- (d) Operator holds unexpired license of class required by permit..... NA
Class: I
- (f) Routine and preventative maintenance schedule/performed
on time..... NA
- (g) Any major equipment breakdown since last inspection..... NA
- (h) Operation and maintenance manual provided and maintained..... NA
- (i) Any plant bypasses since last inspection..... NA
- (j) Regulatory agency notified of bypasses..... NA
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... NA

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power
or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A X
- (b) Sludge management plan current..... NA
(c) Sludge adequately disposed..... NA
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... NA
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... NA
(g) Adequate sludge storage provided at plant.....NA
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... NA
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other X(Specify: Flume)
- (b) Calibration frequency adequate Y
(Date of last calibration: Summer 2007)
- (c) Secondary instruments operated and maintained..... N
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
X Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... N
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... NA
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... NA
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... NA
- (e) Commercial laboratory used..... Y

Parameters analyzed by commercial lab:

TRC, Phenol, Oil and Grease, pH, Cd, Cr, Pb

Lab name:

Cardinal Labs

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. N
- (h) Adequate records maintained..... N
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

SAMPLING NOTES: b) Metals are not be sampled as required. Need to ensure that weeks sampled conform to the defined weeks in Part III of the NPDES permit.
LABORATORY NOTES: Cardinal Labs does the sample collection as well as the analysis. The facility relies on contract laboratory for its QA/QC.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	None	None

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Permit # : 1IQ00000*FD
NPDES #: OH0009296

FORMICA CORPORATION
NPDES COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: November 29, 2007

ITEMS OF DISCUSSION FOR INSPECTION:

This inspection is conducted for the purpose of updating the Agency on the status of the compliance schedule, and what the facility is doing. Because the facility has not complied with its compliance schedule, this area received a rating of unsatisfactory. The compliance schedule is for complying with a limit for Total Residual Chlorine. The facility has missed or been late for four of the five dates in the compliance schedule. A Permit to Install (PTI) was obtained for a dechlorination system, but it was late. The start of construction, status report and completion of construction dates have not been met. The facility must be in compliance with the limit in June 2008.

COMPLIANCE EVALUATION:

The facility had the following exceedences at its outfall. . This letter will also serve as the Notice of Violation for these exceedences and reporting violations.

Outfall 1IQ00000001

EFFLUENT LIMIT VIOLATIONS

<u>Date</u>	<u>Parameter</u>	<u>Code</u>	<u>Permit Limit</u>	<u>Reported Value</u>
12/07/2006	pH	00400	6.5 SU	6.47 SU
02/09/2007	Oil & Grease, T	00550	10 mg/L	48.7 mg/L
05/29/2007	Temperature	00010	30°C	31.7 °C
06/22/2007	pH	00400	6.5 SU	6.4 SU
09/23/2007	Temperature	00010	30°C	32.2 °C
09/29/2007	Temperature	00010	30°C	32.2 °C

The following frequency violations were noted:

<u>Reporting Period</u>	<u>Violation Date</u>	<u>Parameter</u>	<u>Sample Frequency</u>	<u>Expected</u>	<u>Reported</u>
Dec. 2006	12/8/06	Phenolic 4AAP	1/Week	1	0
Dec. 2006	12/8/06	pH	1/Week	1	0
Aug. 2007	8/1/07	Cadmium	1/Quarter	1	0
Aug. 2007	8/1/07	Chlorine,TR	1/ 2 Weeks	1	0
Aug. 2007	8/1/07	Chromium	1/Quarter	1	0
Aug. 2007	8/1/07	Lead	1/Quarter	1	0

Please note that although four Phenolic and four pH samples were collected during December 2006, they did not fall in the correct week as defined in Part III of the facility's NPDES permit. Please ensure that samples for Week 1 are collected on days 1-7, Week 2 on days 8-14, Week 3 on days 15-21, and Week 4 on days 22-28. Because of these effluent and reporting violations, the facility will receive a rating of marginal for "Effluent/Receiving Waters".

The facility received a permit to install (PTI) for the installation of a dechlorination system on June 5, 2007. This was due on December 1, 2006. The equipment is on site, but has not been installed. The facility believes that the elevated chlorine levels are being caused by interference. A copy of the laboratory report was obtained at the inspection. This has been provided to Ohio EPA's Division of Environmental Services for evaluation. The facility must be in compliance with its Total Residual Chlorine limit by June 1, 2008.

OBSERVATIONS:

Formica Corporation manufactures decorative laminates for counter tops and cabinets. The facility uses paper, phenolic resin, and amalamine resin. The phenolic resins are used on the filler sheets and the amalamine is used on the surface. The paper is coated with the resins, and are cured under heat and pressure in the presses. The boiler blowdown is now routed to the MSD Mill Creek Wastewater Treatment Plant. The sanitary flows are also discharged to MSD. The water used in the process is obtained from Southwest Ohio Water instead of on-site wells. Cincinnati Water Works supplies the drinking water for the facility.

Since the last inspection, production has greatly increased. The facility is now operated twenty-four hours a day, seven days a week. The effluent is the overflow from the hot well. The boiler produces steam. The steam then goes through the presses creating heat, that along with the pressure from the press, cures the laminates. The condensate from the presses then flows into the hot well. Once the hot well is full, it then overflows to the pond. A copy of the chemicals used to condition the water in the boiler is needed.

The slats in the cooling towers have been replaced since the last inspection. The facility is looking at taking an additional press to the cooling tower, but this is still in the research phase. If this is done, then the flow will no longer go to the pond.

The facility began looking into sources for the chlorine. The facility believes this may be related to an interference in the Total Residual Chlorine test. Copies of the data provided during the inspection were passed onto Ohio EPA staff. Additional information was requested in an email dated December 19, 2007. Until a determination is made regarding this matter, the facility should continue pursuing the installation of its dechlorination treatment system.

REQUIRED ACTIONS

Formica must provide copies of the MSDS for the chemicals used in association with the boiler. In addition, any Director's Final Findings and Orders (DFFOs) from the Agency for the use of these chemical must be provided.

Formica must provide the additional information regarding the facility's TRC monitoring. This includes:

- The bench sheets and the SOP that describes what they do and why (for residual chlorine). Any sort of interference should be documented in a logbook or on a benchsheet with the procedure in the SOP.
- The analysis for DMR-QA and any performance or QC samples analyzed for residual chlorine.