



State of Ohio Environmental Protection Agency

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\*1IC0004220090428\*

HAMILTON STEELCRAFT MANUFACTURING COMPANY \* PIEKUTOWSKI, MA 2009/04/28

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



State of Ohio Environmental Protection Agency  
Southwest District

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

April 28, 2009

Mr. Stephen Dusold  
Steelcraft Manufacturing Company  
9017 Blue Ash Road  
Cincinnati, Ohio 45242

**Re: Steelcraft -- OH00929416;1IC00042\*CD -- CEI/NPR Inspection  
NOTICE OF VIOLATION**

Dear Mr. Dusold:

On April 8, 2009, Marianne Piekutowski of this office and Kevin Mercier of MSD of Greater Cincinnati met with Paul Schubert to conduct a NPDES no permit required (NPR)/compliance evaluation (CEI) inspection at the Steelcraft facility. The purpose of this inspection was to evaluate compliance with the terms of the NPDES permit and verify there was no longer a discharge from the chillers. Please note that the report, by its format, tends to highlight negative areas.

As indicated on the attached NPDES Compliance Inspection Report, all areas that were rated received a satisfactory rating.

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

Sincerely,

Martyn G. Burt  
Environmental Supervisor  
Division of Surface Water

Enclosures

Cc: Paul Schubert, Steelcraft  
Kevin Mercier, MSD of Greater Cincinnati







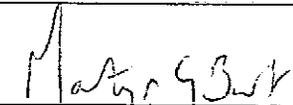
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11C00042*CD	OH0092941	04/08/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Steelcraft Division of Ingersoll-Rand Co. 9017 Blue Ash Road Cincinnati, Ohio 45242	10:00 am	September 1, 2005
	Exit Time	Permit Expiration Date
	11:30 am	August 31, 2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Paul Schubert, Environmental Manager	513.766.4606	
Name, Address and Title of Responsible Official	Phone Number	
Stephen Dusold, Plant Manager Steelcraft Division of Ingersoll-Rand Co. 9017 Blue Ash Road Cincinnati, Ohio 45242	513.766.4720	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
 Marlene Piekutowski Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 4/26/09	Date 4/28/09

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)..... Y
- (d) Flows and loadings conform with NPDES permit..... N
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... Y
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

d) The facility stopped discharging from its NPDES outfall in July 2007. Plant 2 is empty, and all of the chillers in Plant 1 are on closed loop systems.

**Section E: Permit Verification**

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

Comments/Status:

a) The facility has some minor NPDES permit violations and one spill in December 2007. These have been addressed. The facility is no longer discharging via its NPDES permit.

**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) Wastewater Treatment Works classification (OAC 3745-7)..... NA
- (e) Operator of Record holds unexpired license of class required by permit..... NA  
Class: NA
- (f) Copy of certificate of Operator of Record displayed on-site..... NA
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... NA
- (h) Routine and preventative maintenance scheduled/performed... NA
- (i) Any major equipment breakdown since last inspection..... NA
- (j) Operation and maintenance manual provided and maintained..... NA
- (k) Any plant bypasses since last inspection..... NA
- (l) Regulatory agency notified of bypasses..... NA  
On MORs  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... NA

**Record Keeping:**

- (a) Log book provided..... NA
- (b) Format of log book (i.e. computer log, hard bound book)  

NA
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- (c) Log book(s) kept onsite (in an area protected from weather)..... NA
- (d) Log book contains the following:
  - I. Identification of treatment works..... NA
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... NA
  - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... NA
  - IV. Laboratory results (unless documented on bench sheets)... NA
  - V. Identification of person making log entries..... NA
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... NA

**Section G: Operation & Maintenance (con't)**

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

**Comments/Status:**

The facility is not discharging at this time.

**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..... Y
- (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:

**pH, Oil & Grease**

Lab name:

**Cardinal Laboratories**

*Quality Control/Quality Assurance*

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

Date:

**Comments/Status:**

The facility has had the laboratory go back and reanalyze for questionable data.

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
002	NA	N	N	N	N	N	N	N

**Comments/Status:**

There was some flow from a storm water retention pond on-site, but nothing from the plant was being discharged on the day of the inspection.

**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:**

**STEELCRAFT**  
**NPDES NPR/COMPLIANCE EVALUATION INSPECTION**  
**DATE OF INSPECTION: April 8, 2009**

ITEMS FOR DISCUSSION:

The facility had a discharge of non-contacting cooling water from two chiller units inside the plant. These units have been disconnected, and no longer discharge. The facility would like to have its NPDES permit revoked since it is no longer being used. The No Permit Required (NPR) action has been processed by Ohio EPA.

COMPLIANCE EVALUATION:

The facility's compliance history was checked from April 1, 2005 through April 1, 2009. The following violations were noted:

Outfall11C00042002

**EFFLUENT LIMIT VIOLATIONS**

<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
April 2005	TSS	50 mg/L	30 mg/L Avg.
April 8, 2005	TSS	50 mg/L	45 mg/L Max.
November 1, 2006	pH	6.38 SU	6.5 SU Min.
November 2, 2006	Oil & Grease, Hexane	10.8 mg/L	10 mg/L Max.
December 1, 2006	pH	6.38 SU	6.5 SU Min.
May 1, 2008	Oil & Grease, Hexane	206 mg/L	10 mg/L Max.

In addition, on December 14, 2007, there was a release of process wastewater from the facility to storm sewer. This was due to an equipment failure at the facility. This was addressed in a follow up report dated January 2, 2008.

Failure to comply with effluent limits is a violation of Ohio Revised Code (ORC) 6111. The reasons for these violations and steps taken to prevent them from recurring have been provided to Ohio EPA. This report will also serve as the notice of violation for these events.

OBSERVATIONS:

Steelcraft was discharging non-contact cooling water from two machines via its NPDES permit. These machines have been disconnected, and now use a closed-loop chiller. There are 150 chillers used throughout the facility. If the facility would need to operate these chillers in a once-through mode, the water would be discharged to MSD of Greater

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Cincinnati with the rest of their process wastewater.

The storm drains that were inside the facility have been sealed up and nothing is discharged to the storm sewer.

There is a small storm water retention pond that discharges to the storm sewer via the sampling manhole. There was a small amount of flow from the pond in the manhole.

The permit is in the process of being revoked since the facility is no longer discharging non-contact cooling water. The facility will need to obtain coverage under the general industrial storm water permit since they are a categorical industrial user discharging into a separate sewer system. There is equipment being stored outside so the facility will not be eligible for coverage under the "No Exposure" certification.

### **REQUIRED ACTION**

Steelcraft must obtain coverage under the general industrial storm water permit since it will not be covered under an NPDES permit. This must be done prior to June 1, 2009 when the permit revocation is finalized.

