



State of Ohio Environmental Protection Agency

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11C0001820090731

HAMILTON XTEK INC PLANT NO 2 *

PIEKUTOWSKI, MA 2009/07/31

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

Ohio EPA is an Equal Opportunity Employer



State of Ohio Environmental Protection Agency
Southwest District

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

July 31, 2009

Mr. Tom Huth
Xtek, Inc.
11451 Reading Road
Cincinnati, Ohio 45241

**Re: Xtek, Inc. -- OH0048797;1IC00018*GD -- CEI/Pre-Permit Inspection
NOTICE OF VIOLATION**

Dear Mr. Huth:

On July 20, 2009, Marianne Piekutowski of this office met with yourself to conduct a NPDES pre-permit/compliance evaluation (CEI) inspection at the Xtek facility. The purpose of this inspection was to evaluate compliance with the terms of the NPDES permit and update the information in your NPDES renewal application. 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 except for "Self-Monitoring Program" which received a marginal. The reason for this are detailed in the attached report.

Thank you 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





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
11C00018*GD	OH0048798	07/20/09	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Xtek, Inc. 11451 Reading Road Cincinnati, Ohio 45241	10:40 am	January 1, 2005
	Exit Time	Permit Expiration Date
	11:30 am	December 31, 2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Tom Huth, Maintenance and Facility Manager	513.733.7867	
Name, Address and Title of Responsible Official	Phone Number	
Tom Huth, Maintenance and Facility Manager Xtek, Inc. 11451 Reading Road Cincinnati, Ohio 45241	513.733.7867	

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
N	Operations & Maintenance	S	Effluent/Receiving Waters	M	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 report.	
Inspector	Reviewer
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
7/31/09 Date	7/31/08 Date

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..... Y
- (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..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Xtek needs to sample for ammonia for its NPDES renewal application.

Section E: Permit Verification

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

Comments/Status:

a) The facility had one pH violation since the last inspection. There were frequency violations related to the defined weeks in the permit. This has since been resolved. The frequency issue is the reason for the rating of marginal for "Self-Monitoring".

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: I
- (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

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

Comments/Status:

The water from the wells to the quench tanks are monitoring electronically. They were installed and serviced by the facility maintenance staff. The wells electronics are looked at on quarterly basis.

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..... NA
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... NA
- (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: Oil and Grease, pH,

Temperature

Lab name: Cardinal Laboratories

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (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: Unknown

Comments/Status:

Xtek, Inc. relies on Cardinal Labs internal QA/QC.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	N	N	N	N	N	N	N	N
601	NA	N	N	N	N	N	N	N
602	NA	N	N	N	N	N	N	See Note

Comments/Status:

There was a boom to capture any floating oils at 602. However, on the day of the inspection, there was only minimal standing water at each of the outfalls. There was no water being discharged.

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:

There is raw material, surplus equipment and air pollution control devices stored outside. The sewers are combined in this area. In the event the sewers are separated, coverage for industrial storm water will be needed at that time.

XTEK, INC.
NPDES PRE-PERMIT/COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: July 20, 2009

ITEMS FOR DISCUSSION:

The facility has a discharge of cooling water from two quench tanks inside the plant. The facility submitted its renewal application as needed. An ammonia sample is needed for the application.

COMPLIANCE EVALUATION:

The facility's compliance history was checked from September 1, 2004 through July 1, 2009. The following violations were noted:

Outfall11C00018001

EFFLUENT LIMIT VIOLATIONS

Date	Parameter	Reported Value	Permit Limit
12/21/2008	pH	6.19 SU	6.5 SU Min.

FREQUENCY VIOLATIONS

Reporting Period	Violation Date	Parameter	Sample Frequency	Expected	Reported
March 2006	3/15/06	Water Temperature	1/Week	1	0
March 2006	3/15/06	pH	1/Week	1	0
March 2006	3/15/06	Oil & Grease	1/Week	1	0
Sept. 2006	9/1/06	Water Temperature	1/Week	1	0
Sept. 2006	9/1/06	pH	1/Week	1	0
Sept. 2006	9/1/06	Oil & Grease	1/Week	1	0
Dec. 2006	12/22/06	Water Temperature	1/Week	1	0
Dec. 2006	12/22/06	pH	1/Week	1	0
Dec. 2006	12/22/06	Oil & Grease	1/Week	1	0
Jan. 2007	1/31/07	Flow Rate	1/Day	1	0
Nov. 2007	11/22/07	Water Temperature	1/Week	1	0
Nov. 2007	11/22/07	pH	1/Week	1	0
Nov. 2007	11/22/07	Oil & Grease	1/Week	1	0
August 2008	8/22/08	Water Temperature	1/Week	1	0
August 2008	8/22/08	pH	1/Week	1	0
August 2008	8/22/08	Oil & Grease	1/Week	1	0

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. Because of the frequency issues, the facility will receive a rating of Marginal for the "Self-Monitoring Program". After receiving a preliminary compliance report for the December 2008 frequency issues, the frequency issues have been resolved with the contract laboratory.

OBSERVATIONS:

Xtek, Inc. manufactures rollers for cold rolling steel. The facility receives the rollers, and then machines and heat treats them for use in the steel industry. There is no casting done on-site. The wastewater generated on-site is a contact cooling water. The water is from the quenching of the rollers after coming out of the furnaces. The flow rates from the processes are taken from electronic meters on the production wells. There are three private production wells at the facility. Two of the wells are active, and one is used as a back up. The electronic meters were installed on the wells so flows are measured by the meters instead of using a pump count. There are two quench tanks on-site. One is the main quench tank, and the second is a smaller tank. Production is down from previous years due to economic conditions.

The two quench tanks are discharged through outfalls 601 and 602. These outfalls are sampled quarterly for Oil & Grease. The final outfall, 001, is on the unnamed tributary to Mill Creek. Outfall 001 does daily flow monitoring, and weekly monitoring for Oil & Grease, pH and Temperature. There was no flow at any of the outfalls on the day of the inspection. There is still a boom at the internal monitoring station 602.

There is run-on to the facility of storm water from Mac Steel and Kemper Road. Currently, the facility is tied into a combined sewer. Any additional process flows and the sanitary wastewater are discharged to MSD of Greater Cincinnati. Potable water is provided by Cincinnati Water Works. The on-site production wells are only used in the quench tanks.

REQUIRED ACTION

Xtek, Inc. must collect a sample for ammonia for its NPDES renewal application. This must be completed and submitted to the Ohio EPA as soon as there is a discharge from the facility.