



**Environmental
Protection Agency**

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



1IS0000020080502

CHAMPAIGN JOHNSON WELDED PRODUCTS INC

REYNOLDS, JOSEPH 2008/05/02



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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www.epa.state.oh.us

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

May 1, 2008

Ms. Lilli Ann Johnson
Johnson Welded Products
625 S. Edgewood Ave.
P.O. Box 907
Urbana, Ohio 43078

RE: Johnson Welded Products Reconnaissance Inspection.

Dear Ms. Johnson:

On April 10, 2008 a representative of the Ohio EPA (Mr. Joe Reynolds) conducted a Reconnaissance Inspection at the Johnson Welded Products facility, 625 S. Edgewood Avenue, Urbana. The inspection was conducted as part of the National Pollutant Discharge Elimination System (NPDES) permit renewal process for the facility.

The inspection report is attached. There are four items that require a response. The response dates are noted in the report. You will be receiving a draft NPDES permit (the renewal permit will remain draft for a period of 30 day to allow for public comment) later this summer. If you have questions, comments, or corrections concerning the draft, you should contact the district (Joe Reynolds, 937 285 - 6097) during the 30 day comment period.

If you have any questions regarding the report, please feel free to contact Mr. Reynolds at the number above.

Sincerely,

Martyn Burt, Environmental Supervisor
Division of Surface Water

cc: Steve Brandeberry, Facility Engineer
Melody Lucas, Env. & Safety Consultant





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
11S00000*ED	OH0085723	4/10/2008	R	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Johnson Welded Products Inc., 625 S. Edgewood Ave. Urbana, Ohio 43078	11:05 AM	11/1/2004
	Exit Time	Permit Expiration Date
	1:00 PM	6/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Steve Brandeberry, Facility Engineer Melody Luca, Env. & Safety Consult.	(937) 652 - 1242 ext. 276 (937) 459 - 6098	
Name, Address and Title of Responsible Official	Phone Number	
Lilli Ann Johnson, President 625 S. Edgewood Ave. Urbana, Ohio 43078	(937) 652 - 1242	

Section C: Areas Evaluated During Inspection

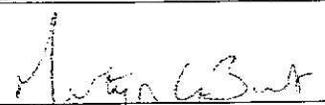
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
M	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**

 5/1/08	 5/2/08
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



Inspection Findings

Johnson Welded Products was issued National Pollutant Discharge Elimination System (NPDES) permit number 1IS00000*ED on August 24, 2004. This permit expires June 30, 2008. A NPDES renewal application was submitted on February 1, 2008.

Johnson Welded Products makes pressure tanks for the braking systems on heavy duty vehicles. There are approximately 260 hourly and 25 salaried employees at the facility. Non-contact cooling water generated from the welding operations is directly discharged through outfall 001. Sanitary waste water is discharged to the City of Urbana.

In addition to non-contact cooling water Johnson Welded Products discharges storm water through outfall 001. This discharge goes to an unnamed tributary of Dugan Run.

The volume of non-contact cooling water was reduced from 100,000 gpd to 75,000 gpd with the installation of a chiller unit on one of the welders. This reduction is also reflective of the temporary elimination of the third shift. Johnson Welded is currently evaluating a closed loop system for all the welding units.

In order to address chlorine residuals in the water supply lines Johnson Welded is currently obtaining Permit to Install approval for a dechlorination system. The system will be installed on the noncontact cooling water supply lines. A pilot study system is currently in use.

While investigating treatment options to reduce chlorine residual levels at outfall 001, representatives from Johnson Welded Products discovered an 8" tile which discharges upgrade of their pond. Samples collected from the pipe identified a chlorine source upstream of the facility. During the site inspection a second pipe was found discharging upgrade of the facility.

A flows meter has been installed on the non-contact cooling water supply line. This meter will be used to record non-contact cooling water flow volumes and also will be used to control dechlorination chemical feed rates.

A continuous reading maximum / minimum temperature thermometer has been added to outfall 001.

In order to limit storm water exposures Johnson Welded Products has moved their drum storage facility inside. A diked chemical and drum storage area has been created inside the facility. Most of the cylinder storage has been moved inside. A lot of the old scrape materials that were being stored outside have been removed.



Inspection Findings (continued)

The Storm Water Pollution Prevention Plan (SWPPP) for the facility is currently being updated to reflect recent capital improvements at the facility.

Recent excavation work was performed on the slope leading to the storm water retention pond. This work was performed to help identify the locations of non-contact cooling water piping and storm water piping that enters the pond. The slope has become destabilized as a result (gully and rill erosion was noted).

The final effluent leaving the pond was clear, no foam. A large amount of pond moss was noted at the outfall (001) in the unnamed tributary of Dugan Run.

A review of final effluent sampling data from January 1, 2006 to February 29, 2008 revealed the following final effluent violations: 8 chlorine limitation violations, 2 chlorine frequency violations, 3 pH frequency violations, 3 flow frequency violations, and 3 temperature frequency violations.

Items Requiring a Response

1. Johnson Welded Products must perform a feasibility and cost study for the establishment of a new 001 sampling location. The new station must allow Johnson Welded Products to obtain representative samples from the non-contact cooling water system while eliminating possible interferences from extraneous contamination sources. The results of this study must be submitted to the Ohio EPA by no later than July 14, 2008.
2. An updated Storm Water Pollution Prevention Plan which reflects current conditions and practices must be submitted to this office. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
3. Johnson Welded Products must evaluate control systems designed to eliminate the discharge of floating solids from the storm water pond into the unnamed tributary of Dugan Run. A copy of the finding from this study must be submitted to the Ohio EPA by no later than July 14, 2008.
4. The excavated slope leading to the storm water pond must be stabilized as soon as possible in order to eliminate the discharge of sediments to the pond. This work must be completed as soon as possible. Written verification as to the completion of this work must be submitted to the Ohio EPA by no later than June 16, 2008.

