



**Environmental
Protection Agency**

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



1IS0000020070108

CHAMPAIGN JOHNSON WELDED PRODUCTS INC

MILLER, JOSEPH

2007/01/08

orphan

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura Powell, Acting Director

January 8, 2007

Lilli Ann Johnson
President
Johnson Welded Products
625 South Edgewood Avenue
Urbana, OH 43078

**RE: NOTICE OF VIOLATION
Compliance Inspection – Johnson Welded Products, Inc.
NPDES Permit # 1IS00000*ED/OH0085723**

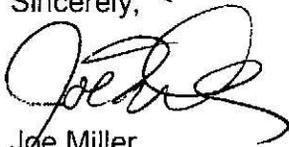
Dear Ms. Johnson,

On December 21, 2006, Jeff Smith, Division of Hazardous Waste Management and I conducted an inspection of your facility with regards to applicable environmental regulations. This inspection was conducted in response to an environmental audit disclosure submitted on behalf of Johnson Welded Products.

Three areas were rated as marginal. The attached inspection report details these areas and associated requirements for correction.

A response to this inspection is requested for the section entitled "Items Requiring a Response". Provide your response to this office by February 5, 2007. If you have any questions, I can be reached at (937) 285-6109.

Sincerely,



Joe Miller
Division of Surface Water
Compliance and Enforcement

CC: Melody Pieper, Harmony Environmental
Stephen Samuels, Schottenstein, Zox & Dunn



**Johnson Welded Products, Inc.
Compliance Evaluation Investigation
December 21, 2006**

Overview

Johnson Welded Products, Inc. (JWP) manufactures air tanks for the trucking industry, which includes shear, form, weld, and finishing steel and aluminum. The NPDES permit is for the discharge of Non-Contact Cooling Water (NCCW) and storm water associated with industrial activity. The NCCW discharge averaged 90,000 gallons per day from January 2002 to January 2007. NCCW is generated from spot welding units for the air tanks. NCCW discharges to a pond which subsequently discharges to an unnamed tributary of Dugan Run, then to Dugan Run a tributary of the Mad River. A commercial de-scaler is used to remove calcium from the system.

The water source for JWP is the City of Urbana's water system. The chlorinated water from the City has proven to be corrosive to copper piping in the manufacturing process. Chlorine violations were reported in the NCCW discharge (October, November 2006).

JWP is categorized under SIC code 3621, metal tank manufacturing, which requires *annual monitoring of storm water discharges and the development of a Storm Water Pollution Prevention Plan (SWP3)*.

Items Requiring a Response

1. Chlorine discharge – JWP plans to submit a Permit to Install (PTI) for the installation of an ascorbic acid dechlorination system to prevent damage to the processing equipment and chlorine effluent violations. Submit the PTI for this unit to the Southwest District Office.
2. Storm Water Requirements – Complete a Storm Water Pollution Prevention Plan and initiate annual sampling as required by Part V, B., 1, column I (last column associated with SIC code 3621).
3. Discharge detection – Review all piping and discharges associated with facility. *Complete a mass balance of water and discharge to determine where wastewaters generated as discharged (City of Urbana sanitary sewer, storm drains, NCCW outfall). All discharges associated with the manufacturing area (including testing waters) should be connected to the sanitary sewer with the exception of the permitted NCCW discharge.*

Other Comments

JWP recently purchased more accurate monitoring equipment. A maximum indicating thermometer must be used for the NCCW discharge. As requested, data substitution codes have been attached.



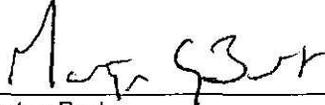
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11S00000*ED	OH0085723	12/21/2006	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Johnson Welded Products, Inc. 625 South Edgewood Avenue Urbana, Ohio 43078	10:30 AM	11/1/2004
	Exit Time	Permit Expiration Date
	12:30 PM	6/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lilli Ann Johnson, President	937-652-1242 ext.222	
Truman Johnson, Engineering	937-652-1242	
Steven Bradeberry, Environmental	937-652-1242	
Name, Address and Title of Responsible Official	Phone Number	
Johnson Welded Products, Inc. Lilli Ann Johnson, President 625 South Edgewood Avenue Urbana, OH 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	S	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	M	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)	
<p>Facility Site Review was rated as Marginal. The facility needs to conduct a study identifying the destination of all piping in facility. Complete a mass balance of water and discharges as described in self-audit disclosure. Determine whether contaminants are reaching waters of the state. A storm water pollution plan needs to be completed as per the NPDES permit.</p> <p>Self-Monitoring was rated as Marginal. Sampling is not being conducted for stormwater as per Parts IV, V, and VI of the NPDES permit. Annual sampling of the parameters described in the NPDES permit Part V., B. 1, column I (last column, associated with facility SIC code 3621).</p> <p>Effluent was rated as marginal due to chlorine effluent violations. Johnson Welded Products is pursuing the installation of a Vita-D-Chlor system (ascorbic acid dechlorination). A PTI will be required.</p>	
Inspector	Reviewer
 Date: 1/5/07	 Date: 1/8/07
Joe Miller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



5. MOR Data Substitution Codes

AA - Below Detectable Limit: *Use this code when the quantitative analysis for a substance is done according to an approved analytical method and does not detect the substance or detects it at a level below, the minimum detection level. When this code is used, the detection limit should be reported in the additional remarks section of the monthly operating report.*

AB - Analytical Data Lost: *Use this code when the analytical data for a sample has been lost. This applies only to recorded data (e.g., paper records, data disks, etc.). This code is not to be used when a sample is lost. In such a case, the sample would be considered not to have been taken. The circumstances causing the use of this code should be explained in the additional remarks section of the monthly operating report.*

AC - Plant Not Operating: *Use this code when the wastewater treatment plant is not in operation and there is no discharge to waters of the state, thereby precluding the collection of samples. The circumstances causing the use of this code should be explained in the additional remarks section of the monthly operating report. (See procedures under AB code to enter the comments).*

AD - Automatic Analyzer Out of Service: *Use this code when an automatic analyzer, which is normally used to analyze samples at the treatment works, is inoperative. The circumstances causing the use of this code should be explained in the additional remarks section of the monthly operating report. (See procedures under AB code to enter the comments).*

AE - Analytical Data Not Valid: *Use this code if the analytical data for a given sample is for some reason not valid. The reason that the data is not valid should be stated in the additional remarks section of the monthly operating report. (See procedures under AB code to enter the comments).*

AF - High Stream Water Inundates Sample Site: *Use this code when the designated sampling site is inaccessible because of the high level of water in a stream. This code should be used for all parameters required to be sampled at the site on the day that it was submerged.*

AG - Trace: *This code should not be used. Use the "AA" code when this condition applies.*

AH - Sample Not Taken, Explanation in Remark Section: *Use this code when a required sample is not taken for a reason other than one covered by another "A" code. An explanation as to why the sample was not taken must be given in the additional remarks section of the monthly operating report.*

AJ - Above Range of Automatic Analyzer: *Use this code when the concentration of a substance is above the level that an automatic analyzer is capable of measuring. This code should only be used for parameters that are normally analyzed by an automatic analyzer. The upper limit of the automatic analyzer should be reported in the additional remarks section of the monthly operating report. (See procedures under AB code to enter the comments).*

AK - Biological Sample Too Numerous to Count: *Use this code when the number of bacterial colonies for each dilution tested exceeds the acceptable number of colonies given by the analytical method used. (Appropriate dilutions should be used to obtain an acceptable count of bacterial colonies.)*

AL - No Discharge For the Month: *Use this code when there was no discharge for the month for a sampling station. This code also applies to sludge stations, use this code when no sludge is used or disposed for the month for the station. The AL code should be placed on the first day, first column of the form. No additional comments are required.*

AN - Sample Not Taken, Plant Not Normally Staffed (Saturdays, Sundays, and Holidays): *Use this code to indicate when samples are not collected on days that the treatment plant is not normally staffed. The use of this code is limited to Saturdays, Sundays, and officially recognized municipal holidays if the treatment plant is not normally staffed on those days.*