



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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

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

December 22, 2008

RE: NPDES Compliance Evaluation Inspection and
Notice of Violation

Mr. Scott Wilson, P.E.
Moyno, Inc.
1895 W. Jefferson St.
Springfield, OH 45506

Dear Mr. Wilson:

On November 6, 2008 I met with you to conduct an inspection of your facility relative to waste water discharges. We discussed sampling and reporting procedures and you showed me your facility's operations and monitoring points. A review of your discharge monitoring reports since the previous inspection in June 2004 revealed the following monitoring violations and limit exceedences:

Monitoring Frequency Violations				
Reporting Period	Parameter	Required Frequency	Violation Date	
2004	May	Oil and Grease	1/Month	No sample taken for the month
	October	Residual Chlorine	1/Week	No sample for the week of October 15 through 21
2005	June	Flow Rate	1/Day	No data for the month
2006	March	Residual Chlorine	1/Week	No sample for the week of March 15 through 21
	October	Residual Chlorine and pH	1/Week	October 8 through 14
2007	May	Oil and Grease	1/Month	No sample during the month
	October	Residual Chlorine and pH	1/Week	No sample for the week of October 15 through 21

Limit Exceedences			
Date	Parameter	Limit	Reported Value
October 1, 2006	Residual Chlorine	0.019 mg/l (Daily Max)	0.05

It appears that the chlorine exceedence might have been related to the start-up of the dechlorination system that was installed in September 2006. The limit exceedence is not considered a violation of your NPDES permit. The weekly reporting violations appear to have been caused by sampling twice during one weekly period and then missing the next weekly period. Please note that weekly sampling periods are defined as days 1 through 7, 8 through 14, 15 through 21 and 22 through 28. Given how long ago the violations occurred and how infrequently they occurred, no response is necessary.

March 2009

Findings from my inspection that require your attention are as follows:

1. You were not able to provide me a copy of your facility's Storm Water Pollution Prevention Plan (SWP3). This is a violation of your NPDES permit and must be rectified as soon as possible. As part of all SWP3s, documentation of regular site inspections is required to be on-site and available for review. I can only conclude that without this documentation that inspections are not being performed. To address this issue, please send an up-dated plan to this office by February 16, 2009 and begin implementation of all inspection and documentation requirements called for by the plan. It is acceptable to submit the plan to me via e-mail.
2. pH is monitored and recorded continuously on a circular chart recorder. It is unclear to me how you determine a value on the chart to report on your Discharge Monitoring Report. When pH is monitored continuously, Ohio EPA normally requires the most critical values (high and low) be reported. A digital recorder makes this very easy to do, but you will need to develop a reporting protocol for the chart recorder. Please indicate how pH will be reported so as to ensure non-compliant results do not go unreported by virtue of which value on which day is selected for reporting.
3. You were unable to provide any documentation of individual analysis that you perform. It is necessary for you to begin documentation of the following information for all monitoring activities:
 - The date and time of sample collection;
 - The name of the person collecting and analyzing the sample;
 - The test method used to analyze the sample; and
 - The result of the analysis

This information must be documented and a log book would be ideal for this purpose. For samples sent off-site for analysis, there should be a chain of custody that records the first two items with the analytical report providing the last two items.

Total Residual Chlorine especially requires analysis is required at the time of collection and calibration of the analytical instrument being a critical requirement to demonstrate that the results are valid. The log book is also a very good place to document sampling and analysis procedures and instrument calibrations dates and results. Please inform me when you begin this effort.

4. You had inquired about testing for sulfate as a surrogate analysis for chlorine. Ohio EPA requires direct analysis of parameters for which limits have been developed so I am not able to offer this alternative analysis for determining compliance for residual chlorine.

Please provide a written response with an indication of your intentions to address the findings from this inspection, including any dates for actions you plan to take. If you have any questions about this letter, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

ENCLOSURE



Ohio Environmental Protection Agency

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number 1IS00019*DD	NPDES Number OH0085413	Inspection Date 11-6-08	Inspection Type C	Inspector S	Facility Type 2
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Section B: Facility Data

Name and Location of Facility Inspected: Moyno Inc. 1895 West Jefferson Street Springfield, OH 45504	Entry Time 1100	Permit Effective Date October 1, 2004
	Exit Time 1335	Permit Expiration Date September 30, 2009
	Name(s) and Titles of On-Site Representative(s) Scott Wilson, P.E. - Manufacturing Engineering Manager	
		Phone Number(s) (937) 327-3224
Name, Title and Address of Responsible Official: Scott Wilson, P.E. - Manufacturing Engineering Manager Moyno Inc. 1895 West Jefferson Street Springfield, OH 45504		Phone Number (937) 327-3224

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE = Not Evaluated)

S Permit	NE Flow Measurement	NA Pretreatment
M Records/Reports	NA Laboratory	NA Compliance Schedules
S Operations & Maintenance	S Effluent/Receiving Waters	NA Collection System
S Facility Site Review	NE Sludge Storage/Disposal	NA Other
M Self-monitoring Program		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Facility's SWP3 was not on-site/available.
- pH is read off a circular paper chart recorder. pH is monitored continuously. It takes two weeks to fill a chart.
- No records of chlorine monitoring - results are jotted down on a note pad until they are reported.
- Seven water meters are used to report flow. The readings are totaled and divided by the number of days since the previous reading to derive the average daily flow. Sources include NCCW for rubber extruder guns, heat exchangers for plating rectifiers, hydraulic fluid cooling, contact cooling water from pump testing, NCCW from water-cooled bearings in heat treating.
- They could save a lot of city water expenses by finding a way to cool the pump test waters so that it could be reused.
- See inspection letter for more details and other findings.

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 12-22-08
Name and Signature of Reviewer(s) Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 12/22/08

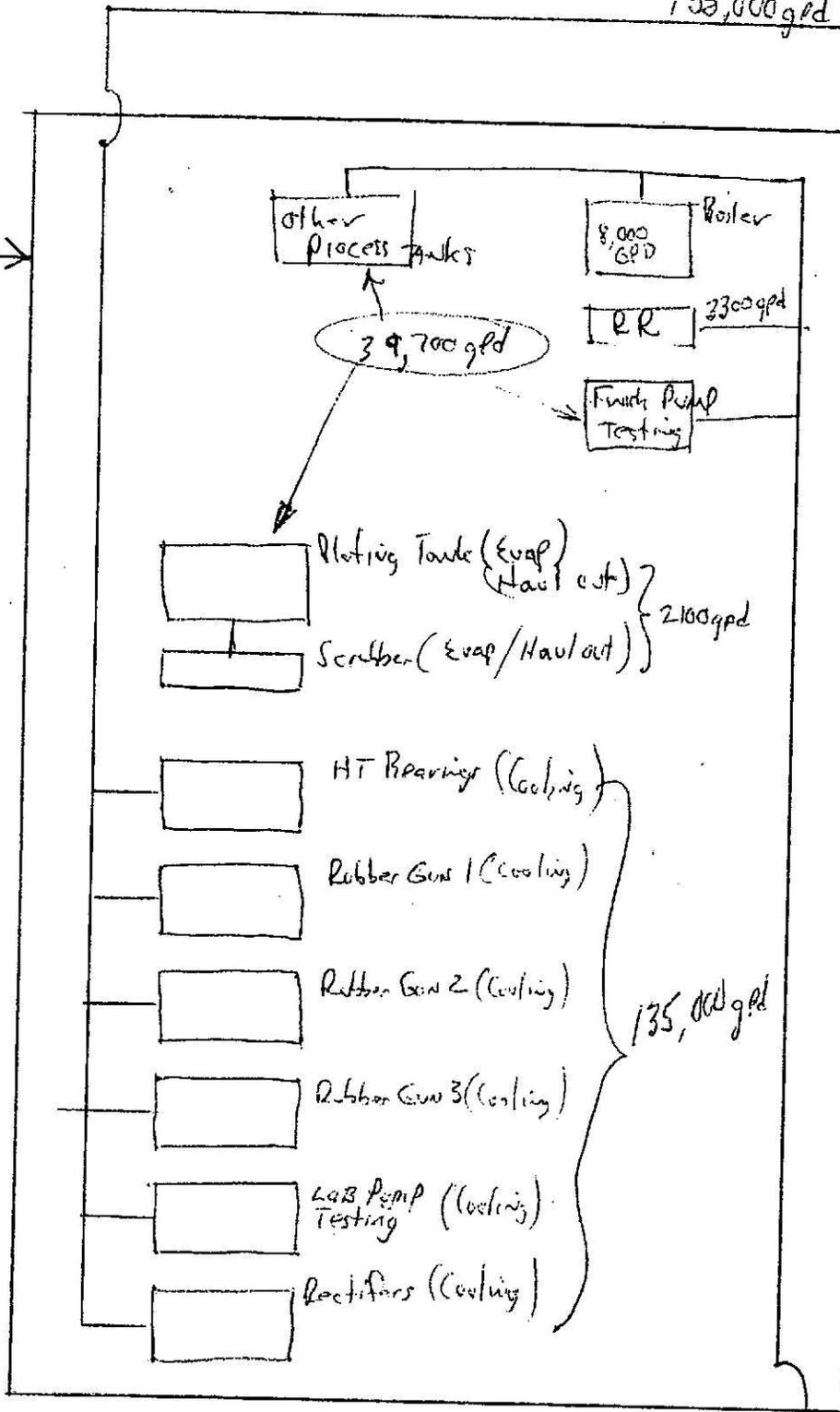
Sent by Mr. Wilson
as follow-up to inspection

1875 W. VETERAN ST.
Springfield, Ohio 45506

135,000 gpd Storm
Sewer

M(1721)

117,000 GPD



M(1723)
69,000 GPD

48,900 GPD

Sanitary
Outfalls
West Jefferson &
Sigler

Scott F. Wilson, PE.
Manufacturing Services Manager
8/16/04