



**Environmental
Protection Agency**

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



1IS0002320081217

CLARK

OS KELLY CO COMPRESSED METALLURGICAL
PRODUCTS

WALBRIDGE, MATT | 2008/12/17



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 17, 2008

RE: Compliance Evaluation Inspection and
Notice of Violation

Mr. Theodore Golba
The O.S. Kelly Company
P.O. Box 1267
Springfield, OH 45501

Dear Mr. Golba:

On November 5, 2008 I met with Mr. Mike Heironimus to conduct an inspection of your facility's wastewater discharges to Buck Creek. Mr. Heironimus is a former employee who is now providing environmental compliance services to your company. A review of your self-monitoring reports since the *previous inspection revealed several limit violations and a large number of reporting violations. Many of these appear to be a result of not reporting 'AN' on weekends and other times when the facility is closed. I have not included these reporting violations in the summary attached to this letter.*

I am most concerned about the failure to conduct monthly monitoring for pH, Oil and Grease, and Total Suspended Solids. Mr. Heironimus explained that monitoring deficiencies occurred during a time of personnel changes and now that he has taken over the monitoring and reporting obligations upon his return in early 2007, there have not been any violations. Please note that it is my intention to eliminate the daily flow monitoring requirement in the renewal of your NPDES permit expiring on March 31, 2009.

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

1. It is necessary to review and update your facility's Storm Water Pollution Prevention Plan (SWP3) to better address the storage and fugitive accumulation of foundry sand. Areas of particular concern are the breezeway, building roofs and the yard on the north side of the property. The SWP3 must specify regular inspections of areas identified in the plan as having the reasonable potential of discharging contaminants in storm water. These inspections must then be documented pursuant to the requirements of your NPDES permit. Storm water run-off is a significant concern for your facility and the required update to your facility's SWP3 is a priority issue that necessitates your prompt attention. An up-dated plan is to be sent to this office no later than March 2, 2009. It is acceptable to submit it via e-mail.
2. Please investigate whether there is a discharge from the cooling tower and where that discharge is directed. There should be a blowdown that either periodically or continuously discharges water from the cooling tower reservoir as a means of ensuring there isn't a build-up of dissolved solids that would otherwise lead to fouling of the tower. A summary of your findings is to be submitted by February 2, 2009 so that I can address it in the NPDES permit renewal if necessary.

3. I noted that Belmont Labs analyzes for pH when they receive the collected sample. Please note that pH is required to be analyzed within fifteen minutes of collection. You will need to either purchase a pH meter for your own analysis (please note that regular calibrations will need to be performed) or arrange for a contract laboratory to collect and analyze a sample at the time they come to pick up collected samples for analysis. Please inform me how you plan to satisfy the analysis requirements for pH.
4. I was informed that a hand pump is used to collect samples that are then analyzed for oil & grease. Please note that oil and grease samples must be collected directly into the jar sent for analysis. Please inform me how you plan to address this requirement including a description of the collection technique you will be following.

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

The O.S. Kelly Company

Monitoring Frequency Violations

Reporting Period	Station	Parameter	Required Frequency	Violation Date	
2004	May	001	Flow Rate and Oil and Grease	1/Month	No sample taken for the month
		002	Oil and Grease, Hexane	1/Month	No sample taken for the month
	April	002	Oil and Grease, Hexane	1/Month	No sample taken for the month
	July	002	Flow Rate	1/Day	31 st
	September	001	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
	December	001	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month 23 rd through 31 st
002		Flow Rate	1/Day	(likely closed for Christmas)	
002		Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month	
2005	May	001	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
	June	001	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
	December	001	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
2006	November	001			No sample taken for the month 1 st through 3 rd
		002	Oil and Grease, pH and Total Suspended Solids	1/Month	6 th through 10 th
		002	Flow Rate	1/Day	13 th through 17 th 20 th through 22 nd 27 th through 30 th
	December	001 002	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
2007	January	001 002	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
	February	001 002	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month
	March	002	Oil and Grease, pH and Total Suspended Solids	1/Month	No sample taken for the month

Limit Violations

	Violation Date	Station	Parameter	Limit Type	Limit	Reported Value
2004	June 10, 2004	001	pH	Daily Maximum	6.5	5.17
	July 2004	001	Total Suspended Solids	Monthly Average	30	35
	October 14, 2004	001	pH	Daily Maximum	6.5	6.16
	August 20, 2004	001	pH	Daily Maximum	6.5	5.45
2005	April 22, 2005	001	pH	Daily Maximum	6.5	5.92
2006	May 2, 2006	002	pH	Daily Maximum	6.5	6.45
	October 5, 2006	002	pH	Daily Maximum	6.5	6.49
	March 8, 2006	002	pH	Daily Maximum	6.5	6.37
	August 15, 2006	001 002	pH	Daily Maximum	6.5	6.39 6.43
2007	May 16, 2007	001 002	pH	Daily Maximum	6.5	6.2 5.9
	June 1, 2007	001	Total Suspended Solids	Monthly Average	30	56
	June 15, 2007			Weekly Average	45	56



Ohio Environmental Protection Agency

NPDES COMPLIANCE INSPECTION REPORT**Section A: National Data System Coding**

Permit Number 1IS00023*BD	NPDES Number OH0085898	Inspection Date 11-5-08	Inspection Type C	Inspector S	Facility Type 2
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Section B: Facility Data

Name and Location of Facility Inspected: O.S. Kelly Company 318 E. North Street Springfield, OH 45503	Entry Time 940	Permit Effective Date 4-1-04
	Exit Time 1220	Permit Expiration Date 3-31-09

Name(s) and Titles of On-Site Representative(s) Mike Heironimus - Environmental Consultant	Phone Number(s) (937) 322-4921 ext. 141
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Name, Title and Address of Responsible Official: Theodore Golba - Vice President & General Manager O.S. Kelly Company 318 E. North Street Springfield, OH 45503	Phone Number (937) 322-4921
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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
U Records/Reports	NA Laboratory	NA Compliance Schedules
M Operations & Maintenance	S Effluent/Receiving Waters	NA Collection System
M Facility Site Review	NA Sludge Storage/Disposal	NA Other
U Self-monitoring Program		

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

- They need to update their SWP3 with emphasis on prioritizing areas for clean-up and inspections.
- No-bake sand is used almost exclusively (90 % of castings). It contains a polyester phenolic binder. The 'Harmon' mold line (green sand) is likely to be discontinued soon.
- City water is used as back up water/cooling supply if the well is out of service.
- A new well was installed in March 2008.
- Approximately 500 gpd of city water is used for cooling the hydraulic system (discharged through outfall 002).
- Approximately 150,000 gpd of air compressor cooling water (non-contact) is discharged through outfall 002).
- Need to find out what the cooling tower serves and where the blowdown is discharged.
- 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 12-17-08
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Name and Signature of Reviewer(s) Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 12/17/08
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