OhioEPA
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

August 31, 2007

RE: NPDES Permit Inspection and Notice of Violation

Mr. Adam Bates
Daido Metal Bellefontaine LLC
1215 Greenwood St.
Bellefontaine, OH 43311-1692

Dear Mr. Bates:

On August 15, 2007 I met with you to conduct an inspection of your facility with regard to its wastewater discharges associated with NPDES permit 1IN00058*DD. A review of your self-monitoring reports since the previous inspection revealed both reporting and limit violations. They are summarized in the attachment to this letter. You indicated that the Oil and Grease violation on October 2006 might have been caused by there being a lot of manufacturing equipment being brought outside as part of a cleaning and reorganization effort. Please elaborate on this potential cause including dates and practices that were employed.

The frequency violations may possibly be associated with the failure to use alternate reporting codes when samples were not able to be collected. These violations persist from the previous inspection findings and necessitate your immediate attention. Please provide a written response indicating how you plan to satisfy your reporting obligations.

From my inspection and our discussions, it is necessary for you to address the following findings:

1. It appears that oil and grease samples are being collected using the automated sample collection equipment. This equipment is activated by the accumulation of a qualifying precipitation event and involves at least collection tubing and a collection container. The sample collected in this container is then transferred into the sample jars prior to being sent to the analytical laboratory. Oil and Grease is required to be collected directly into a glass container with a Teflon seal lid. Analysis occurs directly from this container.

2. You indicated that pH results for days when other parameters monitored monthly are obtained are measured by the analytical laboratory. Please note that pH is required to be monitored at the time of collection (within 15 minutes). It would be acceptable to record the pH on the chain of custody sheet that accompanies the containers sent to the lab.

3. You informed me that in March 2006 Daido installed a new storm water treatment system at the fence line south of the dumpster pad. You referred to it as a filter but it appears to be a separator. The system is installed on a portion of the storm sewer tributary to Elmore's Pond. You indicated that a second separator/filter is planned to be installed on the storm sewer line serving the east side of the facility.

A separator is a treatment system which requires approval from the Director of Ohio EPA pursuant to Ohio Revised Code 6111.45 and Ohio Administrative Code 3745-42. It is necessary to provide details of the installed device, including a description of the design criteria that was used. It is my understanding that a second separator is planned.

Please inform me when you plan to submit the necessary PTI application for the separators. I will be happy to provide you links for accessing forms and instructions.

4. I believe it is necessary for your Storm Water Pollution Prevention Plan (SWP3) to include regular inspections of roofed areas of Daido's facility. Section 4.2.4 of the SWP3 identifies unfiltered roof vents as a potential source for metal dusts yet I did not see that the plan addressed the need to inspect the roof or procedures for cleaning any noted accumulations of pollutants. Please conduct an evaluation as to the potential for roofed areas to contribute pollutants to storm water runoff as soon as possible and inform me on how the SWP3 is amended to address this concern.

5. Recent pH monitoring results indicate a notable difference between outfalls 603 and 002 that I would like for you to investigate. Outfall 002 has been low, with violations below the limit of 6.5 while monitoring station 603 has been high, with violations above the limit of 9.0. Please investigate whether other sources are contributing to your pond or whether there is a problem with pH probes or monitoring techniques that would lead to the differences.

6. I highly recommend that you start cleaning sampling equipment in accordance with the following procedure: Wash all strainers, hoses and sample collection containers with soapy water (using soap such as Alconox®), rinsing with tap water, washing with a 10% hydrochloric acid solution followed by a final deionized water rinse. Cleaned sampling equipment should be stored in a secure and clean environment. To demonstrate that cleaning procedures are effective, periodically drawing DI water through the sampling equipment (including the sample container) for analysis to show that there are no residual contaminants is recommended. These procedures are certainly applicable to any sampling equipment used for monitoring done pursuant to your industrial wastewater discharge permit issued by the City of Bellefontaine.

7. The Chain of Custody sheet for samples collected in October 2006 did not indicate that the samples were preserved. Please ensure that this information is documented on all COC forms.

8. You indicated that samples for Oil & Grease are collected from the composite sampling equipment. Please note that Oil & Grease samples are required to be collected directly into the sample container sent to the laboratory for analysis. I am not aware of any sampling technique other than manual collection. Please indicate how you plan to ensure proper sample collection techniques will be employed for Oil & Grease monitoring.

9. Please consider installing a filter media (e.g.: sock filters or filter pads) over the drains located in the metal scrap storage area. This area appears to be a significant potential source for contaminants to enter the storm sewer system.

   I strongly support the possibility of moving scrap storage to the Aluminum-Lead Building as this would eliminate exposure of scrap metal to precipitation. Please inform me of your plans for implementing this move or otherwise whether you plan to implement any controls on the drains at the scrap metal storage area.

10. While walking along the east side of the facility, I noted what appeared to be an abandoned sanitary lift station located next to what you identified as the 'Met Lab'. It was very dilapidated with significant corrosion on fittings inside the apparently metal below-grade structure. The lift station appeared and smelled like it contained sewage but you were not aware whether this station is active. It is necessary for you to provide the status of this lift station including sources that are tributary to it. I believe its condition needs to be evaluated as soon as possible with a listing of any necessary and recommended improvements provided with your response to this finding. If the lift station is inactive, the contents need to be disposed properly and the structure should be removed or otherwise properly abandoned.

11. Also in the vicinity of the 'Met Lab' building was a plate steel lid over a manhole that was in a seriously dilapidated condition. A significant amount of clear water was flowing into the manhole from pipes entering from both the north and south. The bottom of the manhole was essentially corroded away, although water was flowing out of the manhole into a pipe that discharged toward the manufacturing facility to the west.

    Because of the liklihood that wastewater is entering the ground through this manhole, it is imperative that you make arrangements for its proper repair or replacement. Please indicate how and when you plan to correct the condition of this manhole. You should also assess other pipes and manholes up and downstream from this manhole to determine if corrosion has occurred elsewhere.

    Finally, I ask that you also provide a listing of all wastewater sources discharging through this manhole and determine whether wastewater is tributary to the storm or sanitary sewer system.

The findings from this inspection, including the reporting and limit violations summarized in the attachment, reveal significant deficiencies that Daido Metal must correct quickly. Please provide a written response to this letter by September 21, 2007 indicating how you plan to address the findings of my inspection.

If you have any questions about this letter or the inspection form, please call me at (937) 285-6095.

Sincerely,

Matt Walbridge
Division of Surface Water

ENCLOSURES

CC: Lewie Ekleberry – Daido Bellefontaine

OhioEPA

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
*1IN00058*DD*	*OH0072591*	*8/15/07*	*C*	*S*	*2*

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Daido Metal Bellefontaine LLC *1215 Greenwood St.* *Bellefontaine, OH 43311*	*1000*	*9-1-04*
	Exit Time	Permit Expiration Date
	1350	*8-31-09*
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Adam L. Bates *Environmental, Health & Safety Engineer*	*(937) 592-5010 ext. 689*	
Name, Address and Title of Responsible Official	Phone Number	
Lewie Ekleberry – Plant Manager *Daido Metal Bellefontaine LLC* *1215 Greenwood St.* *Bellefontaine, OH 43311*	*(937) 592-5010*	

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	N	Compliance Schedule
U	Operations & Maintenance	M	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)

Summary of findings requiring a response are listed in the inspection letter.

General observations are as follows:

Mr. Bates indicated that a surface aerator was installed in Elmore's Pond at the beginning of August 2007 as a means for controlling algae growth. The aerator is supposed to only affect the top six inches of the pond and is in an area where the water depth is said to be about 8 feet deep.

Flow values are calculated based on measured rainfall and the surface runoff area.

Inspector	Reviewer
Matt Walbridge 8-31-07	Martyn Bunt 8/31/07
Matt Walbridge Division of Surface Water Southwest District Office Date	Martyn Bunt Environmental Supervisor Division of Surface Water Southwest District Office Date

Summary of Violations
April 2004 through June 2007
Daido Metal Bellefontaine
NPDES Permit 1IN00058*DD

Effluent Limit Violations

Monitoring Station 603

Parameter	Date	Limit	Reported Value
pH	12-28-05	>6.5 S.U.	6.44 S.U.
	3-9-06	>6.5 S.U.	6.19 S.U.
	8-4-06	<9.0 S.U.	9.5 S.U.

Monitoring Station 002

Parameter	Date	Limit	Reported Value
pH	10-20-05	>6.5 S.U.	6.47 S.U.
	11-21-05	>6.5 S.U.	6.47 S.U.
	12-28-05	>6.5 S.U.	6.31 S.U.
	8-4-06	<9.0 S.U.	9.61 S.U.
	6-8-07	>6.5 S.U.	6.44 S.U.
	6-15-07	>6.5 S.U.	6.49 S.U.
Oil & Grease	10-11-06	20.0 mg/l	181 mg/l
	October 2006	15.0 mg/l	181 mg/l

Reporting Frequency Violations

Missing Monitoring Results for Station 603 During 2005

Parameter	Month	Dates
Flow Rate	January	1-7
		8-14
		15-21
		22-28
pH	January	1-7
		8-14
		15-21
		22-28

Missing Monitoring Results for Station 002 During 2005

Parameter	Month	Dates
Flow Rate	January	1-7
		8-14
		15-21
		22-28
pH	January	1-7
		8-14
		15-21
		22-28

Missing Monitoring Results for Station 603 During 2006

Parameter	Month	Dates
Flow Rate	February	1-7
		8-14
		15-21
	March	1-7
		15-21
		22-28
	April	1-7
		8-14
		15-21
	May	1-7
		8-14
		22-28
	June	1-7
		15-21
		22-28
	July	1-7
		15-21
		22-28
	August	8-14
		15-21
		22-28
	September	1-7
		15-21
		22-28
	October	1-7
		15-21
		22-28
	November	1-7
		15-21
		22-28
	December	8-14
		15-21
		22-28
pH	September	1-7
Copper	July	All
	October	All
Nickel	October	All
Oil & Grease	October	All

Missing Monitoring Results for Station 603 During 2007

Parameter	Month	Dates
Flow	January	8-14
		15-21
		22-28
	February	1-7
		8-14
		15-21
	March	1-7
		15-21
		22-28
	April	1-7
		8-14
		22-28
	May	8-14
		15-21
		22-28
	June	8-14
		15-21
		22-28
pH	February	1-7
		8-14
		15-21
	March	1-7
		22-28
Copper	March	All
	May	All
	June	All

Missing Monitoring Results for Station 002 During 2006

Parameter	Month	Dates
Flow Rate	February	1-7
		8-14
		15-21
	March	1-7
		15-21
		22-28
	April	1-7
		8-14
		15-21
	May	1-7
		8-14
		22-28
	June	1-7
		15-21
		22-28
	July	1-7
		15-21
		22-28
	August	8-14
		15-21
		22-28
	September	1-7
		15-21
		22-28
	October	1-7
		15-21
		22-28
	November	1-7
		15-21
		22-28
	December	8-14
		15-21
		22-28
pH	September	1-7
Copper	July	All
	October	All
Nickel	October	All
Oil & Grease	October	All

Missing Monitoring Results for Station 002 During 2007

Parameter	Month	Dates
Flow	January	8-14
		15-21
		22-28
	February	1-7
		8-14
		15-21
	March	1-7
		8-14
		15-21
	April	1-7
		8-14
		22-28
	May	8-14
		15-21
		22-28
	June	8-14
		15-21
		22-28
pH	February	1-7
		8-14
		15-21
	March	1-7
	June	22-28
Nickel	October	All
$CBOD_5$	December	All