



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

June 10, 2008

RE: Compliance Evaluation/Permit Renewal Inspection and  
Notice of Violation

Mr. Thomas Saldoff  
Anchor Fabricators  
PO Box 99  
Clayton, OH 45315

Dear Mr. Saldoff:

On May 28, 2008 I met with you to conduct an inspection of your facility in preparation for renewal of your NPDES permit scheduled to expire on September 30, 2008. A review of your self-monitoring reports going back to January 2006 revealed the following violations of your pH limit:

Violations of 6.5 S.U. pH limit		
	Violation Date	Reported Value
2006	January 24	5.6
	February 24	5.42
	March 24	5.42
	October 31	6.12
	November 30	6.05
2007	February 27	6.18
	March 23	6.46
	May 15	6.23

It is necessary for you to provide an explanation for the violations and a plan for avoiding future violations.

Reported discharge flows have been very low at about ten gallons per day and it was revealed that the discharge flow is blowdown from a cooling tower system serving one of the two laser cutters you operate. The other laser has a closed-loop chiller with no discharge. There is another cooling tower that remains on site from when there was a third laser cutter that no longer exists, but it is not operated.

I noted that you add at least two chemicals to the cooling tower system and are therefore part of the discharge. A sulfuric acid-based descaler (identified as WT-9) and a quaternary ammonia-based algacide (identified as WT-21) are added. As specified in Part II,(C) of your NPDES permit, these additives are required to be approved by Ohio EPA prior to use. It is necessary for you to satisfy this condition as soon as possible. I ask that you notify me when you submit your request for the use of cooling tower additives. Please note that if you collected the cooling tower blowdown and either evaporated it or hauled it off-site, you may be able to eliminate the need for an NPDES permit altogether.

Mr. Thomas Saldoff  
June 10, 2008  
Page 2

During the inspection I also observed an alkaline parts-washing operation that is part of a five-stage phosphate coating line you said was used back when you painted parts. Currently, only the first two stages (alkaline wash and water rinse) are used to wash approximately 300 parts per month. The five stages are configured in an L-shape around a below-grade pit of undetermined volume. Grating over the pit showed that it was full to the point of the overflow line that was not able to be observed. There also were two vibratory tumblers in this room that you said discharge into the pit.

Although you indicated that wastewater from these two operations is not discharged to the receiving stream, I believe you need to better demonstrate this arrangement by properly disposing the contents of the tank and then sealing off the discharge pipe. I also encourage you to properly dispose of the contents of any residual liquids in the unused stages of the parts washer. This should allow you to observe the rate of accumulation in the storage pit from the parts washing and tumbling operations and anticipate the need to have the tank contents properly disposed. It is necessary for you to inform me how and when you plan to address this issue. Please note that I plan to include language in the NPDES permit renewal that explicitly does not authorize the discharge of wastewater from tumbling or parts washing operations.

Finally, I noted a glass jug of what was labeled Nitric Acid setting on top of the fifth stage of the phosphate line. I strongly encourage you to either properly secure or otherwise dispose of this acid to eliminate a serious safety issue.

It is necessary for you to provide a written response to this inspection letter by July 7, 2008 indicating your intention to address the issues I've presented in this letter. If you have any questions, please call me.

Sincerely,



Matt Walbridge  
Environmental Specialist  
Division of Surface Water  
(937) 285-6095



Ohio Environmental Protection Agency

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
1IC00025*DD	OH0048861	5-28-08	C	S	2

## Section B: Facility Data

Name and Location of Facility Inspected:		Entry Time	Permit Effective Date
Anchor Fabricators, Inc. 386 Talmadge Road Clayton, OH 45315		1005	10-1-03
		Exit Time	Permit Expiration Date
		1150	9-30-08
Name(s) and Titles of On-Site Representative(s)			Phone Number(s)
Thomas Saldoff - Engineer			(937) 836-5117 ext. 112
Name, Title and Address of Responsible Official:			Phone Number
Thomas Saldoff - Engineer Anchor Fabricators, Inc. PO Box 99 Clayton, OH 45315			(937) 836-5117 ext. 112

## Section C: Areas Evaluated During Inspection

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

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

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

Please see Inspection Letter

Name and Signature of Inspector(s)  Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 6-10-08
Name and Signature of Reviewer(s)  Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 6/11/08

