



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

April 8, 2008

RE: Compliance Evaluation/Permit Renewal Inspection  
Notice of Significant Non-Compliance

Mr. Mike Willson  
APS Materials  
4011 Riverside Drive  
Dayton, OH 45405

Dear Mr. Willson:

On March 28, 2008 I met with you to conduct an inspection of your facility in preparation of renewal of your expired NPDES permit. A compliance review going back to January 2005 revealed that you failed to submit a monthly operating report (now known as a discharge monitoring report) for the following months:

Year	Months with No Report
2005	January through March, May, July through December
2006	January through December
2007	January, February, April through June, August through October, December
2008	February

For those months when a report was submitted, you failed to conduct required monitoring for Flow, Temperature, Residual Chlorine and pH on the following occasions:

Monitoring Results Lacking for:				
	Temperature (daily monitoring required)	Flow Rate (daily monitoring required)	Chlorine (required once per month)	pH (required once per month)
2005	April 2 – 30	April	April	April
	June 1 – 14 June 16 – 30	June	June	June
2007	March 2 – 31	March	March	March
	July 1 – 8 July 10 – 31	July	July	July
	November 1 – 20 November 22 – 30	November	November	November
2008	January 1 – 6 January 8 – 31	January	January	January

These are significant violations of the terms and conditions of your NPDES permit and must be corrected immediately. Please note that analysis of temperature, residual chlorine and pH are required at the time of collection using methods found in 40 CFR, Part 136.

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Your general failure to report is a serious deficiency. I strongly encourage you to consider subscribing to Ohio EPA's new e-DMR reporting system. It is replacing the SWIMware system and it is proving to be very popular and successful. One of the many benefits is that there is no software involved on your end. You just log onto our web site using your internet service provider, pull up your report and enter monitoring data. If you get called away or aren't ready to submit a report, you can save it pick up where you left off when you log in at another time you. For more information, including how to register, please visit our website at <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

My observations of your facility operations revealed the following issues that require your attention:

### **Waste Water Sources and Discharge Points**

Your renewal application indicates that three buildings discharge non-contact cooling water to a storm sewer catch basin located in the middle of the intersection of Nottingham Street and Walbrook Avenue. I observed only a discharge from Building 1 at the catch basin. Additionally, the renewal application indicates the storm sewer runs to the Stillwater River directly east from the catch basin, yet I observed water flowing through a pipe exiting the catch basin to the north toward Building 3 with no indication of where water leaves your property.

A wash tank in Building 3 appeared to be discharging to the same drain that non-contact cooling water from a nearby thermal sprayer discharges into. You informed me that this tank is filled with de-ionized water and that parts are cleaned by immersion into the tank whereby ionic contaminants on the parts are dissolved into the de-ionized water then discharged to the drain.

To provide an accurate record of your facility operations, it is necessary for you to identify each manufacturing operation and piece of equipment that generates waste water. The information should be presented on a building layout format for each building. It should identify the flow rate (gpm), average daily volume (gpd) and plumbing pathway (either to the sanitary or storm sewer system). Please submit the findings from your investigation to this office by May 12<sup>th</sup>.

### **Chlorine Discharge Limits**

Sampling data submitted with your renewal application showed residual chlorine at 0.47 milligrams per liter (mg/l). It is likely higher given that the analysis was conducted in the laboratory two days after sample collection instead of at the time of collection as is required. As you are likely aware, chlorine is a constituent of the potable water you use as cooling water.

Ohio's Water Quality Standards establish criteria for chlorine applicable to waters of the state. NPDES permits are the mechanism used to apply water quality criteria. Your facility's discharge is subject to the water quality criteria and I have identified the need for your discharge to be limited to 0.038 mg/l total residual chlorine. This will necessitate you either eliminating the discharges or installing treatment. I will await your response due May 12<sup>th</sup> before drafting your permit renewal. Your permit may need to include a compliance schedule.

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### Metal Finishing Operations

During the inspection I inquired about operations in a building to the west of Building 1 that I've since learned is owned by CerAnode™ Technologies, a division of APS Materials. Inside, I observed what you described as an acid etching process for coil wire that I recall you saying is subsequently coated with titanium. Discharges from the processes appeared to go to a floor drain and you indicated that the building discharged to the sanitary sewer. There may also be a wet scrubber associated with the process. Please note that these operations are regulated by the National Categorical Pretreatment Standards for Metal Finishing (40 CFR, Part 433.17). I have contacted the City of Dayton who is the regulatory authority for discharges ultimately tributary to their waste water treatment plant. They will be contacting you to address obligations under their pretreatment program.

Once I receive your response to this inspection letter I will contact you to discuss the renewal of your NPDES permit. I ask that you please make the necessary arrangements to conduct all monitoring and reporting required by your permit. If you have any questions, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge  
Division of Surface Water

### ATTACHMENTS

CC: Sharon Vaughn – City of Dayton





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
1IN00216*BD	OH0118265	3-28-08	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
APS Materials, Inc. 4011 Riverside Drive Dayton, OH 45405	9:50	7-1-01
	Exit Time	Permit Expiration Date
	1130	6-30-06
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Willson - President	(937) 278-6547	
Name, Address and Title of Responsible Official	Phone Number	
Mike Willson - President APS Materials, Inc. 4011 Riverside Drive Dayton, OH 45405	937) 278-6547	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated, NA = Not Applicable)					
U	Permit	M	Flow Measurement	NA	Pretreatment
U	Records/Reports	NA	Laboratory	NA	Compliance Schedule
M	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
M	Facility Site Review	NA	Sludge Storage/Disposal	NA	Other
NA [obj1]	Collection System				

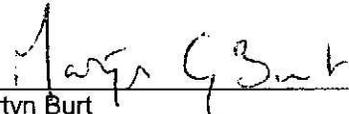
**Section D: Summary of Findings (Attach additional sheets if necessary)**

*See inspection letter for details of findings and summary of violations.*

*There are approximately 20 thermal spray machines that generate approximately 7 gpm of NCCW. Water is used to cool the electrical supply cables to keep them from melting. Most are on a solenoid valve system that activates with the plasma generator is activated, but some are manually activated.*

*Could only verify that Building 1 (153 Walbrook Ave) discharges to the storm sewer.*

*There was an apparent Metal Finishing operation in the building to the west of Building 1.*

Inspector	Reviewer
 Matt Walbridge Division of Surface Water Southwest District Office	 Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office
4-8-08 Date	4/8/08 Date

