



State of Ohio Environmental Protection Agency

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MONTGOME FLOWSERVE CORP SERVICE AND REPAIR
DIVISION *

WALBRIDGE, MATT 2008/03/27

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



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 26, 2008

RE: NPDES Permit Inspection and
Notice of Violation

Mr. Randy Eldred
Flowserve Corp
635 N. Irwin St.
Dayton, OH 45403

Dear Mr. Eldred:

On March 25, 2008 I met with you to conduct an inspection of your facility in preparation for renewal of your NPDES permit. It was necessary to verify the changes you have made to eliminate waste water sources discharging through your permitted outfall. Your NPDES renewal application was supported by my observations and I will proceed with drafting the permit renewal to simply require reporting of emergency discharges of melt furnace cooling water associated with power failures. Storm water requirements currently in the permit will continue into the renewed permit.

I found Flowserve to be in non-compliance with the requirements of Parts IV, V, and VI of your permit. Specifically:

- You were not able to provide a signed copy of a Storm water Pollution Prevention Plan (SWP3) as required in Part IV(B)(1) and (2)
- The unsigned copy of the SWP3 dated November 1, 2006 that was provided during the inspection was not up-to-date (e.g.: it identifies a non-storm water source that has been eliminated). This is in violation of Part IV(C).
- There was no site drainage map available as required by Part IV(D)(2)(a)(1). Such a map needs to identify all types of material storage as outlined in Part IV(D)(2)(b).
- There were no annual monitoring results required by Part IV(D)(3). Monitoring is required for Oil & Grease, BOD, COD, TSS, duration of storm event, precipitation amount, duration between previous storm event, estimated volume, lead, cadmium, copper, arsenic and chromium. This annual monitoring should have been conducted since 2002 with updated results incorporated into the revised SWP3. I have previously asked for this annual monitoring data but none has ever been provided. Failure to monitor is a significant violation of the terms and conditions of your NPDES permit.



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- There were no annual reports summarizing inspection activities and observations as required by Part IV(D)(4)(c). These summaries determine the effectiveness of the SWP3 and identify the need for any necessary updates.

It is necessary for Flowserve to conduct a comprehensive evaluation of its SWP3 addressing all the requirements in Parts IV, V and VI of your NPDES permit, especially those items listed above. The evaluation must address the roof areas of foundry buildings.

Findings from your evaluation, resulting in a signed, up-dated SWP3 should be submitted to this office by May 5, 2008. Please include a summary of all available results of annual storm water monitoring required by the permit.

Finally, when we were in the area where x-ray film development occurs I observed a sump that the associated silver recovery units discharge into. You previously had identified this sump discharge as being connected to the storm sewer system and had re-routed it to the sanitary sewer. I could only observe the sump discharge pipe going through a ceiling tile along with documentation you provided showing payment in October 2006 for approximately \$1,200 in plumbing costs associated with the re-routing. Please provide a diagram showing how and where the plumbing was connected to the sanitary sewer.

If you have any questions concerning this inspection letter, please contact me at (937) 285-6095.

Sincerely,



• Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ATTACHMENT





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
11N00034*FD	OH0009032	3-25-08	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Flowsolve Corp. Foundry Operations 635 N. Irwin St. Dayton, OH 45403	0930	8-1-01
	Exit Time	Permit Expiration Date
	1100	7-31-06
Name(s) and Titles of On-Site Representative(s)	Phone Number(s)	
Randy A. Eldred - Environmental Manager	(937) 226-4313	
	(937) 671-0580 (cell)	
Name, Title and Address of Responsible Official:	Phone Number	
Randy A. Eldred - Environmental Manager Flowsolve Corp. Foundry Operations 635 N. Irwin St. Dayton, OH 45403	(937) 226-4313	

Section C: Areas Evaluated During Inspection

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

M	Permit	S	Flow Measurement	NA	Pretreatment
U	Records/Reports (storm water monitoring)	NA	Laboratory	NA	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-monitoring Program
S	Facility Site Review	NA	Sludge Storage/Disposal	U	Other (Updated SWP3)
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 3-26-08
Name and Signature of Reviewer(s) Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 3/27/08

