Ohio | Environmental Protection Agency

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

December 27, 2010

Mr. John Kline
Milacron, LLC
2090 Florence Avenue
Cincinnati, Ohio 45206

Re: Milacron, LLC – Mt. Orab – Annual Inspection - NOTICE OF VIOLATION SNC Determination

Dear Mr. Kline:

On December 2, 2010, I conducted the annual industrial user (IU) inspection at the Mt. Orab facility. The facility was represented by Greg Halcomb. The Mt. Orab facility is regulated under the Metal Finishing Existing Source Categorical Standard, 40 CFR 433.15. The inspection covered the plating area, the various machining areas, the pretreatment system, the steam room, and the aqueous parts washer area.

The facility was clean and well maintained. The facility has submitted its sampling reports as required. The sampling frequency and reporting issues have been addressed. The report due June 1, 2010 was submitted as required with no violations. However, after reviewing the sampling data, there were zinc violations in the first half of 2009. These violations met the definition of significant non-compliance (SNC) for chronic and technical review criteria (TRC) for the average violations. The violations were resolved, and the facility returned to compliance for zinc in the second half of 2009. Because of this, the facility will receive an overall rating of marginal.

Brief Description of Facility

The Milacron, Inc. facility in Mt. Orab machines and plates plastics manufacturing machinery. The finished parts are shipped off-site to the Cincinnati or Batavia facilities for assembly. There are also parts being brought in from other facilities for machining. This includes parts for wind turbines from General Electric and Clipper Wind, as well as fittings for the oil industry. There is no wastewater associated with the machining. Process wastewater is generated by a chrome plating line, the Parco line, an iron phosphating line, the steam room, and from the aqueous parts washer. The wastewater from the Parco and chrome plating lines is now being recycled after it has been through treatment. There is a sump in the basement that contains storm water. There has been a wall built around the sump to prevent any wastewater spilled in the basement from reaching the sump. The facility now has the ability to collect this water

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and pump it back to the pretreatment system or off-site for proper disposal.

The facility has installed additional ladders and catwalks to allow for easier access to the pretreatment system.

Regulated Flows

The regulated flows are the same as in past inspections (report dated December 21, 2001). The soap tank (parts washer) for the facility is not being discharged to the sewer. This is being shipped off-site with Resource One for disposal. The oil levels were too high. This tank is neutralized prior to shipping. The cooling coils for the chrome line are now under a positive pressure. If there is leak in the coils, then the water from the coils will fail out into the chrome line. This is to prevent the chrome from getting into the cooling tower.

Scrap metal is being taken by Wilmington Iron and Metal.

Sampling

The facility is submitting its self-monitoring as required. After reviewing the data from 2008 through June 2010, the following limit violations were noted:

EFFLUENT LIMIT VIOLATIONS

Station No. 1DP00002001

Parameter	Code	Date	Reported	Units	***Permit*** Limit
Zinc, Total	01092	02/2009	3,822	ug/L	1,480 ug/L (Avg)
Zinc, Total	01092	02/01/09	3,822	ug/L	2,610 ug/L (Max)
Zinc, Total	01092	03/2009	2,300	ug/L	1,480 ug/L (Avg)
Zinc, Total	01092	04/2009	2,724	ug/L	1,480 ug/L (Avg)
Zinc, Total	01092	04/01/09	2,724	ug/L	2,610 ug/L (Max)
Zinc, Total	01092	06/2009	2,030	ug/L	1,480 ug/L (Avg)

The reporting and frequency violations noted in previous reports have been addressed. In addition, the facility returned to compliance with its zinc limitations in the second half of 2009. This report will serve as the notice of violation (NOV) and SNC notification for

these issues. They have been addressed satisfactorily.

The assistance provided by your staff was appreciated. If you would have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,

Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosure

cc: Ryan Laake, DSW/CO
Greg Halcomb, Milacron, LLC
John Vanharligen, Mt. Orab

OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00002*EP	OHP000105	12/02/2010	I	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Milacron, LLC 418 West Main Street Mt. Orab, Ohio 45154	9:00 am	07/01/2007
	Exit Time	**Permit Expiration Date**
	10:15 am	06/30/2012

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Greg Halcomb, Safety & Environmental Control Manager	513.536.2246

POTW Receiving Discharge	Categorical Standard(s) or Other Classifcation
Village of Mt. Orab WWTP	40 CFR 433.15

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

M	Pretreatment			

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

See attached report.

Inspector	Reviewer
12/27/10 Date	1/3/11 Date
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***Milacron, Inc. – Plastic Technologies Group***

Date of inspection: ***December 2, 2010***

OH Number: ***OHP000105***

IDP Number: ***1DP00002*EP***

Facility Representative: ***Greg Halcomb***

Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***December 8, 2009***

2. Has the facility been in compliance with its permit limits since the last inspection? ~~Y~~ / **N**
   If no, explain:

The self-monitoring data was submitted. During the first half of 2009, there were two daily zinc violations and four average zinc violations. The facility was in significant non-compliance for the first half of 2009 for average zinc violations for both the chronic and technical review criteria (TRC). The facility returned to compliance for zinc during the second half of 2009. The sampling for cBOD, NH3 and Oil & Grease is now being done correctly. The facility was in compliance for all parameters and frequency criteria for the first half of 2010.

3. Is the facility in compliance with all other requirements?

Sampling procedures	**Y** / ~~N~~ / ~~NA~~
Reporting (late reporting, failure to report, etc)	**Y** / ~~N~~ / ~~NA~~
Compliance schedules	~~Y~~ / ~~N~~ / **NA**
Submitted BMR and 90 day compliance reports	~~Y~~ / ~~N~~ / **NA**
Any other requirements	~~Y~~ / ~~N~~ / **NA**

   If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? ~~Y~~ / ~~N~~
   Explain any unresolved actions:

All issues have been resolved.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***190***

6. Shifts/Day: ***2***

7. Production Days/Year: ***355***

8. Hours/shift: ***8 working overtime also.***

9. Any production changes since the last inspection? ~~Y~~ / **N**
   If yes, explain:

The workload is back up to the normal workload range. The facility is doing more subcontract work for other companies. Subcontract work is still being done. The facility is still doing some subcontracting for GE, but is trying to get more work.

10. General facility description and operations:

Machine parts for plastics machinery. Subcontract machining for the wind turbine and oil industries. This now accounts for just over 50% of the facility's work.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? ~~Y~~ / **N**
If yes, explain:

Carbon steel, cast iron, small amounts of brass and aluminum. Also doing some stainless steel.

12. Any expansion or production increase expected within the next year? ~~Y~~ / **N**
If yes, explain:

A third shift may be added, but there is nothing concrete at this time.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

See attached schematic.

14. Was a PTI issued for the treatment system? **Y** / ~~N~~

15. Were there any modifications to the treatment system since the previous inspection? ~~Y~~ / **N**

If yes, was a PTI obtained? ~~Y~~ / ~~N~~

PTI Number: Date:

16. What is the treatment mode of operation? ~~Batch~~ / ~~Continuous~~ / **Combination**

If batch, list the frequency and duration:
The oil skimmer operates on a continuous basis. The wastewater treatment system operates on a batch basis, however, this is now being routed back to the process. It is no longer discharging to the sanitary sewer.

17. Who is responsible for operating the treatment system?
Ron Reeves in the Heat Treat/Chrome Plating Department.

18. How often is the treatment system checked?

At least daily. There are cameras on the area that feed to the guard's office.

19. Is there an alarm system for the system? Y / ~~N~~
Explain:

Level and pH alarm.

20. Is there an operations and maintenance manual? Y / ~~N~~
There are SOPs that are used.

21. Is an inventory of critical spare parts maintained? Y / ~~N~~
If yes, list:
This is maintained by the Maintenance Division.

22. Are there any bypasses in the system? ~~Y~~ / N
If yes, describe the location:

Have bypasses occurred since the last inspection? ~~Y~~ / N

Was the POTW notified? ~~Y~~ / ~~N~~

23. Are residuals or sludges generated? ***Pretreatment filter cake.*** Y / ~~N~~

Method of disposal:
Disposed of at a hazardous waste landfill. (Envirite)

Frequency and amount of disposal:

~12 drums per year.

Name of hauler/landfill/disposal facility:

Envirite takes the pretreatment filter cake and renders it non-hazardous for disposal.

Is any sludge generated subject to RCRA regulations? Y / ~~N~~

If land applying sludge, is there a sludge management plan? ~~Y~~ / N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
*Chrome/Parco Line**	*After treatment*		*2,800*		
Iron Phosphating	*End-of-process*		*50*		
Steam Room	*Oil Skimmer*		*1,500*		
Parts Washer**	*End-of-Process*		*4,000 gal/qtr*		
Total Regulated Process Flow					
Non-Contact Cooling			*6,000****		
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			*1,800*		
Filter Backwash			-		
Compressor Condensate			*20*		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			*7,500*		
TOTAL FLOW					

** - This wastestream is now being recycled.*
*** - This is being disposed off-site by Resource One.*
**** - Out of heat treat. It is being recirculated.*

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

Storm water discharges are covered under the general industrial storm water permit.

SELF MONITORING

26. Sample location(s) described in the facility's permit:
Samples shall be collected from the following locations:
a) The effluent of the final discharge tank of the chrome treatment system prior to mixing with other wastestreams;
b) The last compartment of the oil skimmer;
c) The effluent of the iron phosphating operation prior to mixing with other wastestreams; and
d) The effluent of the parts washing operation prior to mixing with other wastestreams. Being shipped off-site for disposal.

27. Is the facility sampling at the location(s) described in the permit? ~~Y~~ / **N**
If no, describe the actual location:

The effluent from the parts washing operation is no longer being sampled. This is being sent off-site for disposal by Resource One.

28. Is the location(s) where the facility is sampling representative? **Y** / ~~N~~
If no, indicate a representative location:

29. Is the flow measured or estimated? ***Both.*** **Measured / Estimated**

If measured, how often is the meter calibrated?
Iron phosphate rinse set up to have known flow rate. The pretreatment system operates on a batch basis so the volume of each batch is known. The steam room has a meter.

If estimated, describe method of estimation:

30. Is pH monitored continuously? ~~Y~~ / **N**
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? **Y** / ~~N~~
If no, specify the sample collector:

32. Are appropriate sampling procedures followed?
Monitoring frequencies **Y** / ~~N~~
Sample collection (grab for pH, O&G, CN, phenols, VOCs) **Y** / ~~N~~
Flow proportioned samples **Y** / ~~N~~
Proper preservation techniques **Y** / ~~N~~
Sample holding times **Y** / ~~N~~
Chain-of-custody forms **Y** / ~~N~~

33. Are samples analyzed in accordance with 40 CFR 136? **Y** / ~~N~~

34. Laboratory conducting analyses:

Test America

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? **Y / ~~N~~**
    If yes, identify organics:

Stoddard solvent, paint thinner in 1 quart containers. There is a chemical management software system being used. The MSDS are entered into the system.

36. Does the facility have a current toxic organic management plan(TOMP)? **~~Y~~ / N**

    If yes, is it being implemented? **~~Y~~ / ~~N~~**

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: **~~Y~~ / N**

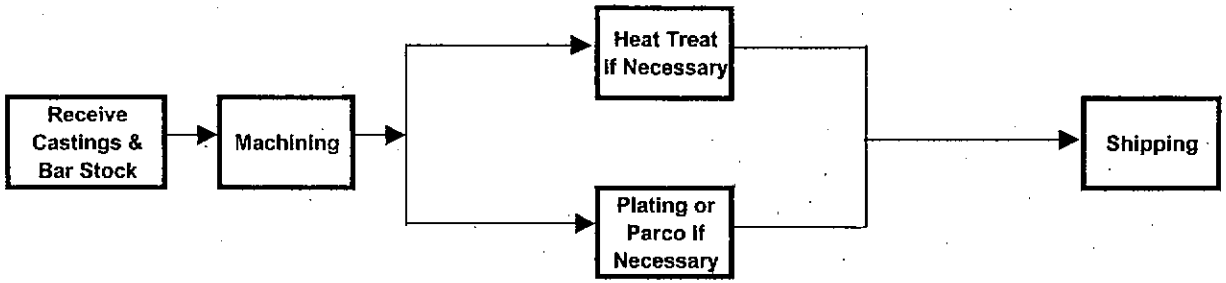
38. Does the facility need a spill prevention plan or slug discharge control plan? **Y / ~~N~~**

    If yes, does the facility have a written plan? **Y / ~~N~~**

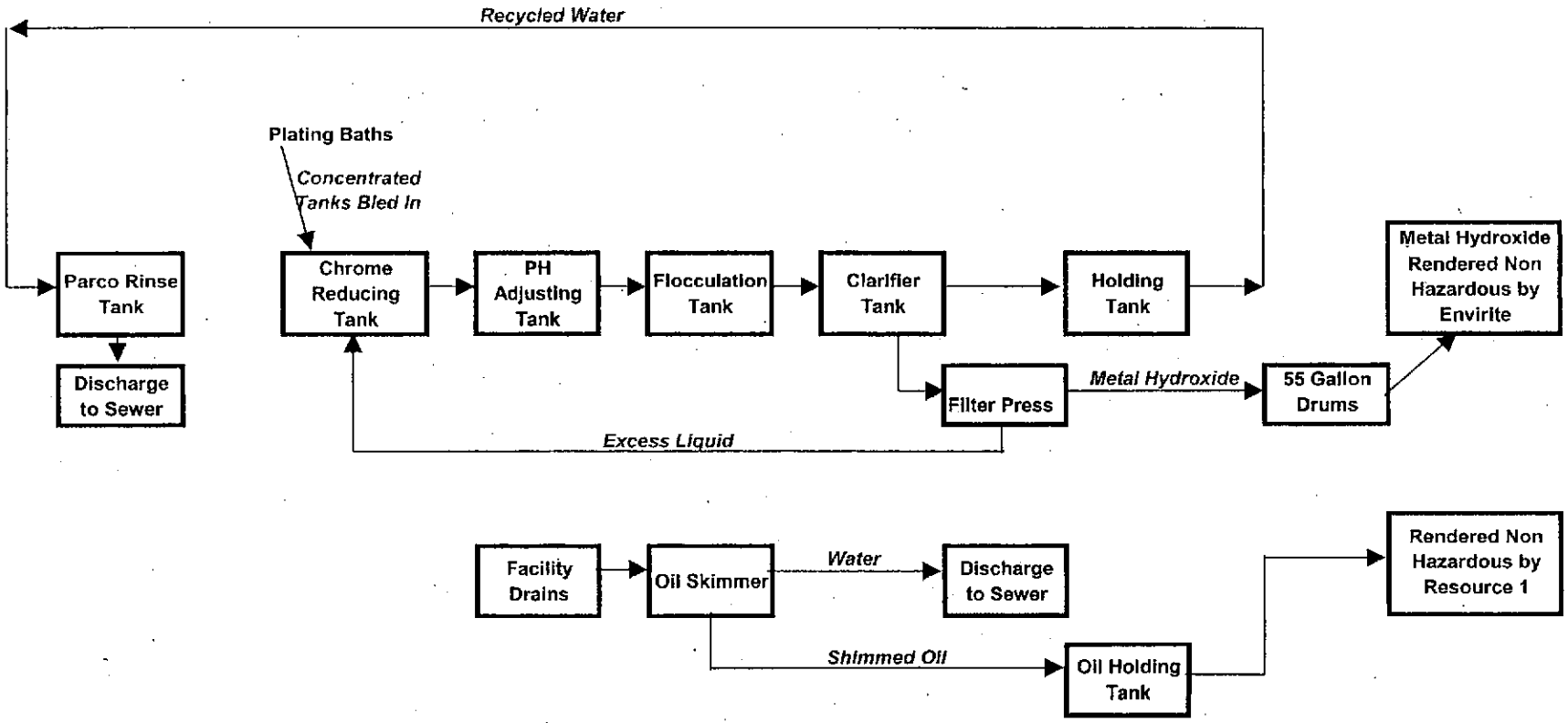
39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS

Cincinnati Milacron
Mt Orab Plant
Process Schematic



Pretreatment Schematic



ProcessSchematic2-17-05.xls