



State of Ohio Environmental Protection Agency
Southwest District

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Dayton, Ohio 45402-2911

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

December 19, 2008

Mr. Tim Scott
PCP Champion/Surgical Appliances
300 Congress Avenue
Ripley, Ohio 45167

Re: PCP Champion – Ripley – Annual Inspection – NOTICE OF VIOLATION

Dear Mr. Scott:

On December 9, 2008, I conducted the annual industrial user (IU) inspection at your facility. The facility was represented by yourself. The facility is regulated under the Metal Finishing Existing Source Categorical Standard, 40 CFR 433.15. The inspection covered the plating area, the pretreatment system, the machining area, the chemical storage area, and the sampling point.

The facility had a zinc violation in February 2008 since the last inspection. This was violation of both the daily and monthly average. There also appears to be a total cyanide violation for both the daily and monthly average in March 2008. This is a reporting error. The report needs to be corrected and resubmitted. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

PCP Champion manufactures orthopedic and convalescent equipment. The facility receives steel and aluminum tubing, as well as plastic parts, to fabricate and assemble into various products. The facility is also producing a neoprene knee brace.

Regulated Wastewater Flow

The sources of wastewater have not changed since previous inspections (report dated December 23, 1993). The total volume of chrome/nickel plating is still down. The plating is operating between four to six hours a day. There are some times that there is no plating done at all. The facility has purchased a competitor's equipment for anodizing and powder coating. More and more of the work at the facility is being powder coated off-site. During the past year, the facility took down its pretreatment system, and recoated the grating with an epoxy coating.



Sampling

The Village of Ripley still collects grab samples from the discharge. The spiking for chromium and nickel seems to be under control at the present time. The facility takes four grab samples throughout the operational day at the facility. These samples are composited and then analyzed.

The facility needs to note the preservation methods on its chain-of-custody forms, and list the correct sample type on the reports. The facility must take care when entering the sampling data onto the 4519 form. There was a decimal point error for the Total Cyanide value. It was reported to be 10 mg/L. This would be a violation of both the daily and the average limit. The value should be 0.010 mg/L. The facility should request the lab provide all of the metals data in ug/L instead of mg/L, and the cyanide in mg/L to prevent these problems in the future.

The following violations were noted in the facility sampling reports:

<u>Parameter</u>	<u>Type</u>	<u>Code</u>	<u>Date</u>	<u>Reported</u>	<u>Permit Limit</u>
Nickel, Total	Daily	01067	02/01/08	5,640 ug/L	3,980 ug/L
Nickel, Total	Average	01067	02/200/	5;640 ug/L	2,380 ug/L

Failure to comply with permit limits is a violation of Ohio Revised Code (ORC) 6111. The facility resampled in March 2008, and returned to compliance. The reason for the violations was a probe failure. The probe in the pretreatment system was replaced, and the facility returned to compliance.

Storm Water Permit

The facility currently has coverage for its storm water under the general industrial storm water permit. On the day of the inspection, there had been sludge from the pretreatment system placed in the roll-off box sitting outside the building. There was sludge on the ground, but it was immediately cleaned up.

REQUIRED ACTIONS

1) PCP Champion must list the preservation methods on chain-of-custody form. The metals are taken as a composite not a grab sample. The correct sample type must be listed on the form. This must begin immediately.

2) PCP Champion must resubmit its self-monitoring report for the first half of 2008 correct the cyanide result for March 2008. It was reported incorrectly. This must be done by January 20, 2009.

December 19, 2008

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RECOMMENDED ACTION

1) PCP Champion should consider requesting its contract lab provide all of the metals data in ug/L instead of mg/L, and the cyanide in mg/L to prevent decimal point issues in the future.

The assistance you provided was appreciated. Should you have any additional questions, feel free to contact me at 937.285.6108.

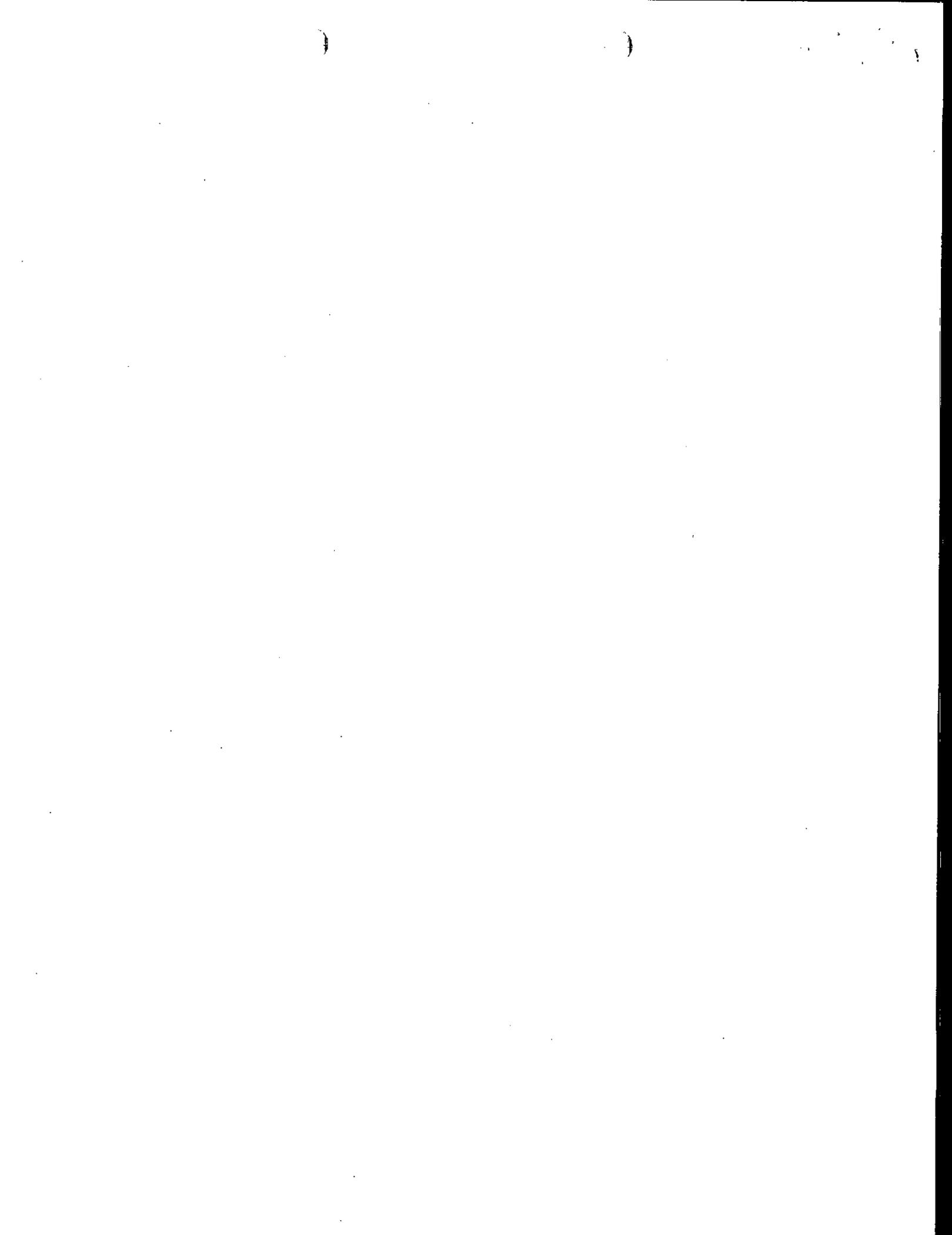
Sincerely,

A handwritten signature in black ink, appearing to read 'Marianne Plekutowski', with a long horizontal flourish extending to the right.

Marianne Plekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Ryan Laake, DSW/CO
Dave Klump, Ripley





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
1DP00017*EP	OHP000117	12/09/2008	I	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
PCP Champion/Surgical Appliances 1311 East Second Street Ripley, Ohio 45167	11:00 am	07/01/2007
	Exit Time	Permit Expiration Date
	12:25 pm	06/30/2012
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Tim Scott, Plant Manager		937.392.4301
POTW Receiving Discharge		Categorical Standard(s) or Other Classification
Village of Ripley WWTP		40 CFR 433.15

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

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

See attached report.

Inspector	Reviewer
 Mariante Piekutowski Division of Surface Water Southwest District Office Date 12/19/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date 12/22/08

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *PCP Champion*

Date of inspection: *December 9, 2008*

OH Number: *OHP000117*

IDP Number: *1DP00017*EP*

Facility Representative: *Tim Scott*

Inspector(s): *Mari Piekutowski*

COMPLIANCE

1. Date of last pretreatment inspection: *December 5, 2007*

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

There was a zinc violation in February 2008. This is both a daily and monthly violation. There appears to be a cyanide violation in March 2008, but this is a decimal error. There also appear to be decimal point issues for the second half of 2007. The report was to be resubmitted to correct these items.

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:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *27*

6. Shifts/Day: *1*

7. Production Days/Year: *270*

8. Hours/shift: *8.5*

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

The facility has run samples of new products. These should be in production during the next year. It should not impact the wastewater significantly.

10. General facility description and operations:

Manufacture home health care products.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:
12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

WASTEWATER TREATMENT

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

See attached diagram.

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 facility will batch treat when needed. When the system is operating normally, it will be run in the continuous mode.

17. Who is responsible for operating the treatment system?
Tim Scott

18. How often is the treatment system checked?

Every two hours at a minimum.

WASTEWATER TREATMENT CONTINUED

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

There are pH and level alarms on the system.

20. Is there an operations and maintenance manual? Y / ~~N~~

21. Is an inventory of critical spare parts maintained? Y / ~~N~~
If yes, list:

pH meters, pH probes, bisulfide probe, diaphragms for pumps, extra switches.

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? Y / ~~N~~

Method of disposal:

The filter cake is landfilled.

Frequency and amount of disposal:

The roll-off box was hauled off-site on August 22, 2007, and replaced. It took approximately 6 years to fill the roll-off container.

Name of hauler/landfill/disposal facility:

Onyx hauls the roll-off to Envirosafe.

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
<i>Nickel-Chrome Line</i>	<i>End-of-Process</i>		2,500		
Total Regulated Process Flow			2,500		
Non-Contact Cooling			3,250		
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			-		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			1,000		
TOTAL FLOW			6,750		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).
None. Only the storm water doesn't go to the POTW. The facility has received coverage 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 manhole immediately downstream from the wastewater treatment system in the storage room west of the plating and wastewater treatment room.

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

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? Measured / Estimated
If measured, how often is the meter calibrated?

If estimated, describe method of estimation:

The use of the water meter readings and flow restrictors (2.5 gpm).

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

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

32. Are appropriate sampling procedures followed? Y / ~~N~~
Monitoring frequencies ~~Y~~ / ~~N~~
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / ~~N~~
Flow proportioned samples **Grab sample taken every two hours.** 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:

Belmont Park. The facility will split samples with the Village. The Village uses MASI for its samples.

TOXICS MANAGEMENT

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

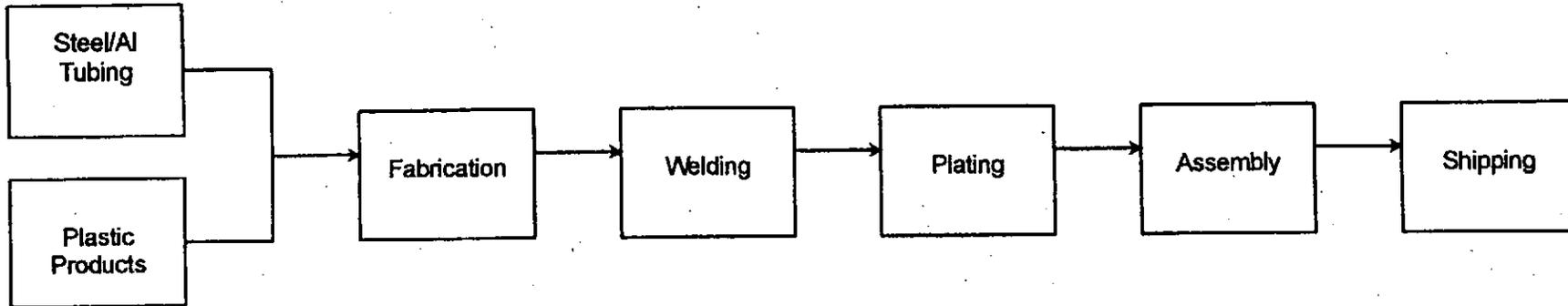
All of the chemical storage areas have trench drains that go to the pretreatment system. All of the wastewater must be pumped in order to reach the sewer.

REQUIRED FOLLOW-UP ACTIONS

Preservation methods need to be circled on chain-of-custody form. The metals are taken as a composite not a grab sample. The correct sample type must be listed on the form.

PCP Champion must resubmit its self-monitoring report for the first half of 2008 to correct the cyanide result for March 2008. It was reported incorrectly.

PCP - Champion Process Schematic



Pretreatment Schematic

