



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 Korleski, Director

December 30, 2009

Mr. Mike Walkup
Ripley Metalworks, Ltd.
111 Waterworks Road
Ripley, Ohio 45167

**Re: Ripley Metalworks, Ltd. – Ripley – Annual Inspection –
NOTICE OF VIOLATION**

Dear Mr. Walkup:

On December 8, 2009, I conducted the annual industrial user (IU) inspection of the Ripley Metalworks facility. The facility was represented by Rich Phillips. The facility has been determined to be a significant industrial user (SIU) because it is regulated under the Metal Finishing New Source Categorical Standard, 40 CFR 433.17. The inspection covered the iron phosphating line, the powder coat area, and the machining area.

Since the last inspection, the facility has not submitted any additional self-monitoring reports. Raw data for the second half of 2008 was reported to Ohio EPA. The facility was working with its contract laboratory about submitting the data. There was a miscommunication between the laboratory and the facility. The notarized delegation form needs to be provided to Ohio EPA for this to occur. The contract laboratory is working with the facility to correct this. The facility will receive an overall rating of marginal.

Brief Description of Facility

Ripley Metalworks, Ltd. is a job shop manufacturer of sheet metal. The facility receives sheet metal that is mainly mild steel. The metal is then punched or laser cut, formed and welded. The pieces are then ground. Once the parts have been ground, they can either be shipped or painted.

Description of Regulated Flows and Pretreatment

The flows are the same as they have been in previous inspections (report dated December 30, 1997). The washer and powder coat line use is the same as in previous inspections. The line is still being run on one shift. The line was not running at the time of the inspection. There was no discharge to the sewer at the time of the inspection. Work is down substantially since last year's inspection.



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Sampling

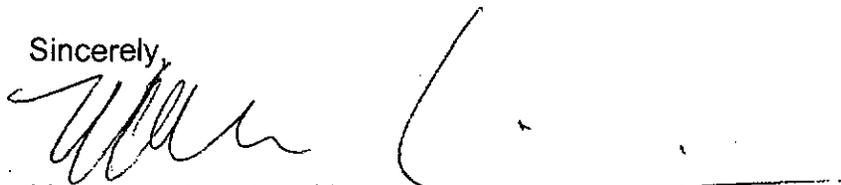
Ripley Metalworks is a batch discharger. Prior to discharge, the pH of the wastewater is checked. If the pH is out of range, then it is manually neutralized prior to discharge. The samples are taken as a grab sample since the tank acts to composite the discharge. Cardinal Laboratories is taking the discharge samples for the facility, and does the analytical work. The facility must make the necessary arrangements to ensure that the sampling data is submitted. The required sampling has been done in 2009, but it has not been submitted to Ohio EPA. Once this has been worked out, the data for the second half of 2008 and the first half of 2009 must be submitted using eDMR. The data for the second half of 2009 is due on January 20, 2010. This inspection report will also serve as the notice of violation for the failure to submit the monitoring reports.

REQUIRED ACTION

Ripley Metalworks must submit all of its self-monitoring data, using eDMR, for the second half of 2008, the first half of 2009, and the second half of 2009 by January 20, 2010.

The assistance provided by your staff was appreciated. Should you 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: Dave Klump, Ripley
Ryan Laake, DSW/CO
Rich Phillips, Ripley Metalworks
Antoinette Ruschman, Cardinal Laboratories



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

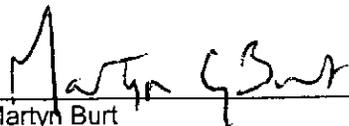
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00023*CP	OHP000132	12/08/2009	I	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ripley Metalworks Ltd. 111 Waterworks Road Ripley, Ohio 45167	10:30 am	11/01/2008
	Exit Time	Permit Expiration Date
	11:05 am	10/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Rich Phillips	937.392.4992	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Village of Ripley WWTP	40 CFR 433.17	

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
 Marianne Piekutowski Division of Surface Water Southwest District Office	 Martyn G Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 12/30/09	Date 12/30/09

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Ripley Metalworks Ltd.*

Date of inspection: *December 8, 2009*

OH Number: *OHP000132*

IDP Number: *1DP00023*CP*

Facility Representative: *Rich Phillips*

Inspector(s): *Mari Piekutowski*

COMPLIANCE

1. Date of last pretreatment inspection: *December 9, 2008*

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

The facility lost its environmental consultant. The sampling data for its discharge has not been submitted since June 2008. They had been working with the laboratory to see if they would be able to submit the data. This has not been done. The contract laboratory was going to contact the facility.

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: *29*

6. Shifts/Day: *1 (Washer only runs 1 shift a day)*

7. Production Days/Year: *260*

8. Hours/shift: *8*

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

Production is down since the last inspection.

10. General facility description and operations:

Sheet metal fabricator and job shop. Manufacture rails and sheet metal products for Square D and FKI Logistics. Manufacture automobile windshield forms for Glasstech. There are other customers that the facility does work for.

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 sheet.

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:

17. Who is responsible for operating the treatment system?
Kevin Germann is the main operator. The chemical supplier (Galaxy) comes in monthly to check the system.

18. How often is the treatment system checked?

Prior to discharge.

WASTEWATER TREATMENT CONTINUED

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

The level of the tank is checked daily.

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

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

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:

Sludge build up in the tanks and washer.

Frequency and amount of disposal:

Based on the process and production rates. Nothing has been sent off during the past year.

Name of hauler/landfill/disposal facility:

*United Wastewater Services
Scrap metal is taken by Stanco.*

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

If land applying sludge, is there a sludge management plan? **NA** 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>Iron Phosphating Line</i>	<i>End-of-Process</i>		<i>3 gpm</i>		
Total Regulated Process Flow			3 gpm		
Non-Contact Cooling			-	<i>Compressor condensate is not present at sampling location.</i>	
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			yes		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			-		
TOTAL FLOW					

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

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 sampling tap in the effluent line from the process wastewater tank.

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

Y / ~~N~~

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

Y / ~~N~~

29. Is the flow measured or estimated?

~~Measured~~ / Estimated

If measured, how often is the meter calibrated?

If estimated, describe method of estimation:

Based on the volume of the holding tank. The facility has also timed the rate into the tank (12 gpm)/

30. Is pH monitored continuously?
If yes, how often is the meter calibrated?

~~Y~~ / N

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

~~Y~~ / N

Cardinal Labs collects the samples and Webco had been preparing the reports. The facility deciding how to proceed. It appears this was dropped at some point, and not followed up on. The contract lab was going to contact the facility. Samples have been collected as required, but have not been reported.

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:

Cardinal Laboratories

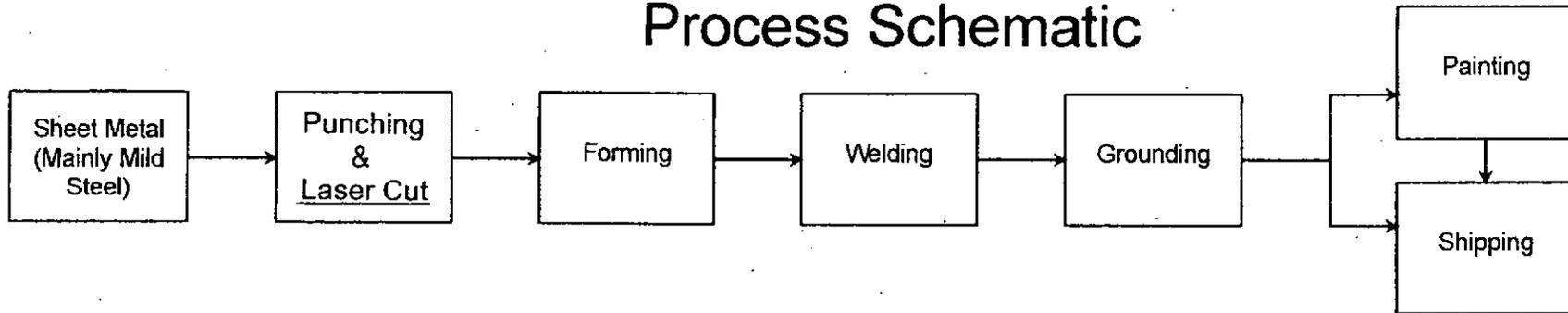
TOXICS MANAGEMENT

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:

REQUIRED FOLLOW-UP ACTIONS

Ripley Metalworks must submit the required sampling data for the second half of 2008, the first half of 2009, and the second half of 2009 (due January 20, 2010). All of the data must be submitted by January 20, 2010.

Ripley Metalworks Ltd. Process Schematic



Pretreatment Schematic

