



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 8, 2011

Mr. Jim Spurlock
Schneider Electric North American Division
5735 College Corner Road
Oxford, Ohio 45056

Re: Schneider Electric/Square D -- Oxford -- IU Inspection

Dear Mr. Spurlock:

On June 22, 2011, I conducted the annual industrial user (IU) inspection at the Schneider Electric facility in Oxford. The facility was represented by yourself. The facility is considered to be a significant industrial user (SIU) because there are the powder coat lines that are considered to be metal finishing operations. These operations are regulated under the Metal Finishing Categorical Standard, 40 CFR 433.17. The inspection covered the receiving area for raw materials, the machining and assembly areas, the two powder coat lines, and the wastewater treatment area with the sampling location.

The facility has been in compliance with its permit limits since the last inspection. The self-monitoring report for the second half of 2009 was submitted as required. The facility checked RCRA metals for sampling so there were no results for Total Cyanide, Copper, Nickel or Zinc for July/August 2009. A total of three samples were collected though for all parameters. All of the reports for 2010 were submitted as required. The sample for Total Toxic Organics (TTOs) for the first half of 2010 was collected, but was not analyzed due to exceeding sample holding times. The contract laboratory's courier stopped picking up samples, and the facility was not aware of this change. The self-monitoring report for the second half of 2010 was complete, and showed no violations. The frequency issues have been addressed. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Schneider Electric manufactures electrical distribution equipment including bus duct and wireway products. The facility machines, coats and assembles the raw materials for use in industrial applications.

Regulated Flows and Pretreatment

Schneider generates regulated flow associated with the coating of parts. At the present time, there are two regulated sources. These are the two powder coat lines. The powder coat line is used to provide insulating properties to bars that will be used in

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busways for outdoor applications. The parts pass through an alkaline cleaner and an iron phosphate bath plus the associated rinses prior to being powder coated. The alkaline and iron phosphate tanks are heated with a closed loop heat exchanger. The parts then pass through the powder coat and into an oven for curing. The powder coat line has replaced the e-coat line, and eliminated the paint booth for custom colors. Custom colors can be placed directly over the normal gray color using the powder.

Each of the phosphating lines have a waste treatment system associated with them. These systems are used for pH neutralization. In addition, the wastewaters that are generated on-site are treated as described in previous inspections (report dated July 26, 2004). Production now runs one ten hour shift, four days a week. There is some production work on Fridays now through the rest of the year. The facility is investigating the removal of its pretreatment system.

The facility is using its reverse osmosis (RO) system for its clean process water. The deionized water with a resin that was regenerated using acid and caustic has been removed, and reduced the risk associated with having the acid and caustic totes up on a mezzanine platform. The pH neutralization for this discharge is no longer needed. The RO reject water does not require any treatment.

With the iron phosphating and reverse osmosis installations, the facility no longer needs to treat its wastewater to meet its permit limits. The facility is looking into eliminating the treatment system. The wastewater would flow into the mix tank, and would then be discharged to the sewer system directly from the mix tank. The sampling location for this was also discussed as part of the inspection.

Square D is now recycling the Mylar used to wrap parts. Dupont took approximately 30 tons of it last year. The facility would like to go to a zero-landfill operation. There is an internal team working towards this goal. The dry tape mentioned in last year's report did not work out, so glycol ether is still used in clean up. The facility is also looking into some recycling of its Lexan.

Storage Areas

The outside storage areas are the same as in previous inspections (report dated July 26, 2004). They were not inspected this year.

Sampling

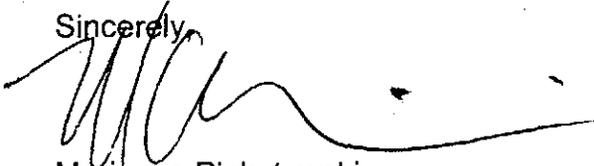
The facility is sampling in the effluent clear well. The sampling location is representative. The facility is currently only using one clear well.

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The assistance provided by you was appreciated. Should you have any questions regarding this report, feel free to contact me at 937.285.6108.

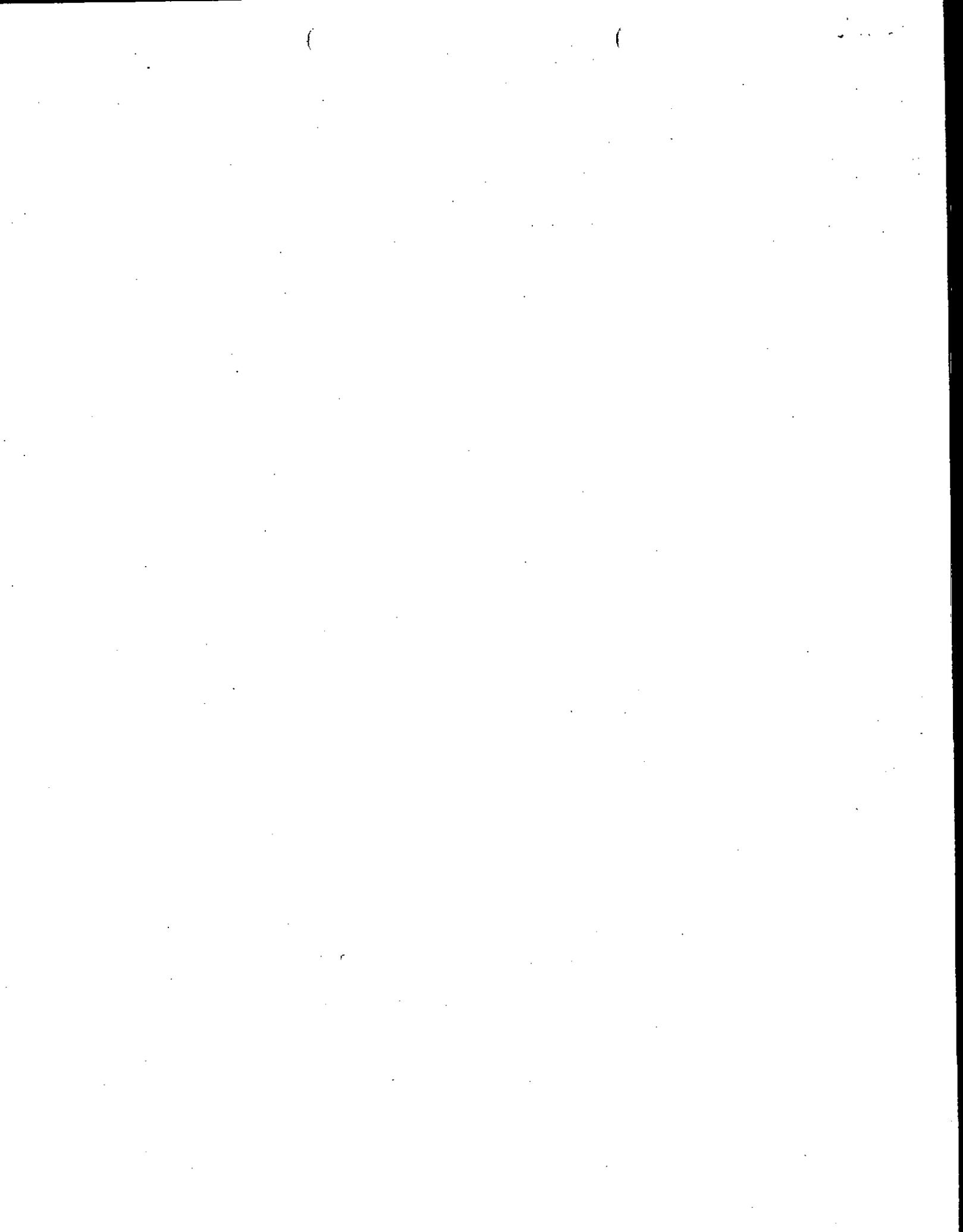
Sincerely,

A handwritten signature in black ink, appearing to read 'Marianne Piekutowski', written over a horizontal line.

Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Ryan Laake, DSW/CO
Jeff Rattliff, Oxford





State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

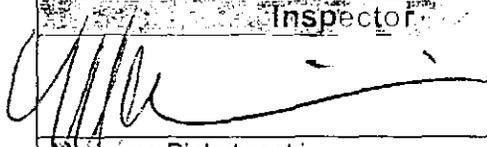
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00031*BP	OHP000138	06/22/2011	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected Schneider Electric North America Division 5735 College Corner Road Oxford, Ohio 45056	Entry Time	Permit Effective Date
	Exit Time	Permit Expiration Date
	10:00 am	07/01/07
	12:15 pm	06/30/12
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Jim Spurlock, Safety & Environmental Manager		513.664.4100
POTW Receiving Discharge		Categorical Standard(s) or Other Classification
City of Oxford WWTP		40 CFR 433.17

Section C: Areas Evaluated During Inspection	
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)	
S	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 Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
7/9/11 Date	7/11/11 Date

INDUSTRIAL USER INSPECTION CHECKLIST

Facility **Schneider Electric Square D Co.**

Date of inspection: **June 22, 2011**

OH Number: **OHP000138**

IDP Number: **1DP00031*BP**

Facility Representative: **Jim Spurlock**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **June 11, 2010**

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

Y/N

The eDMR reporting has been working. There was not a TTO sample for the first half of 2010 due to sample holding times being exceeded. The facility must ensure samples are collected in the correct months. For the first half of 2009, there were three samples, but the first two months were missed. The report for the second half of 2010 had no reporting or frequency problems.

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?
Explain any unresolved actions:

Y/N

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **250**

6. Shifts/Day: **1**

7. Production Days/Year: **208**

8. Hours/shift: **10**

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

Y/N

- The facility runs production four day a week, ten hours a day. Office staff are there for five eight-hour days. There is some production on Fridays. The number of production days may increase for the rest of the year.

10. General facility description and operations:

Manufacture electrical distribution products.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

Copper
Aluminum
Steel

Dupont is taking the Mylar for recycling. The facility is trying to reduce the amount of waste going to the landfill. Eventually, they would like to be a zero-landfill facility. The facility is working on recycling some of the Lexan used at the plant.

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

The PZA product line was brought back into the facility. There are 40 additional employees back. There was some painting for the Lexington plant that increased flows for late March, April and May. The flows are back down to normal levels now.

WASTEWATER TREATMENT

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

See attached schematics. The facility is looking at eliminating its metals removal system since there is only iron phosphating occurring. With the installation of the RO system, the need for pH adjustment has also been eliminated.

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: **611922**

Date: **June 13, 2007**

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

If batch, list the frequency and duration:

There is continuous treatment, but it is released on a batch basis. A batch is released approximately once a day.

17. Who is responsible for operating the treatment system?

Bill Johnson, John Wittwer

18. How often is the treatment system checked?

The pH of each batch is tested prior to discharge. A continuous pH meter was installed in mid-April 2010.

WASTEWATER TREATMENT CONTINUED

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

pH alarms, level alarms. If the pH is out of range, then the system is shutdown

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

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

Pump parts.

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:

Rumpke Landfill

Frequency and amount of disposal:

Approximately 200#/month or less. The sludge press was replaced with a smaller press.

Name of hauler/landfill/disposal facility:

Rumpke Waste

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
Powder Coat	End of Process		5,000		
Total Regulated Process Flow			3,000		
Non-Contact Cooling			800		
Blowdown			5,000		
Reverse Osmosis			3500 to 5000		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW			5,000 gpd		

-The RO unit only discharges when on. Controlled by a float valve. Discharge once a shift.
 - Non-contact cooling water blowdown based on conductivity.
 - Boiler blowdown is closed loop to air handler. The flow is the volume in the boiler loop/HVAC.

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

The storm flow from the facility flows overland into Elams Run. The facility has coverage under the general industrial storm water permit.

SELF MONITORING

26. Sample location(s) described in the facility's permit:

The sampling manhole installed at the effluent pipe from the clear well.

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

The facility is sampling the effluent from the clear well. Only one clear well is being used. Looking at taking the clear wells out. All flows coming into waste treatment are metered.

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?

There is a known volume in the clear well. Water meter readings are also used as a backup to the volume of the clear well.

If estimated, describe method of estimation:

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

The probes are calibrated monthly. A two point (4 & 10) calibration done. Twice a year an outside service calibrates.

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 *Time composited.* 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. The bottles are received from the lab preserved.

TOXICS MANAGEMENT

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

Clean up solvent (glycol ether) is used. Safety Kleen maintains these stations. They use mineral spirits. The rags that are used with solvent are collected by Safety Kleen. The mineral spirits usage has been cut by 50%. They have been replaced with a water-based coolant. There are only two machines left with mineral spirits these should be eliminated in the next year.

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

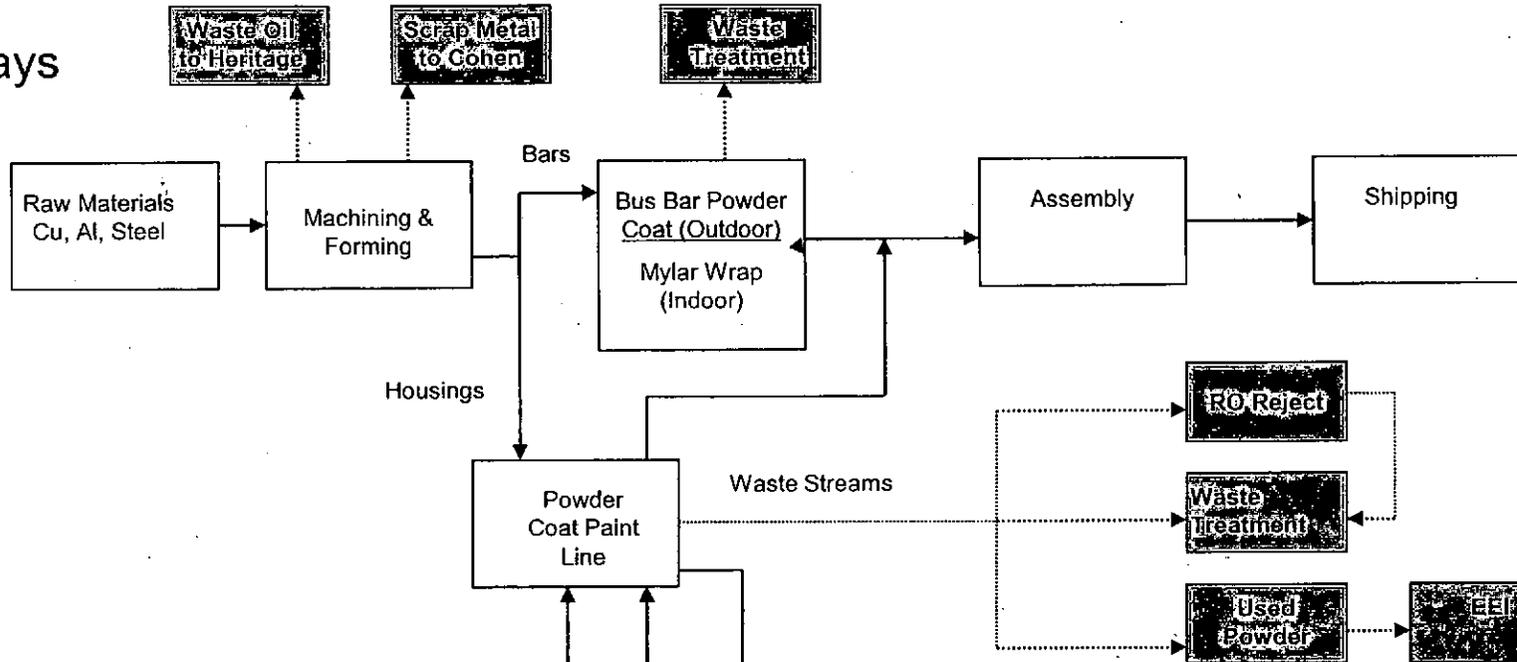
39. Identify any potential slug load or spill areas:

The facility has an SPCC for its fuel oil storage.

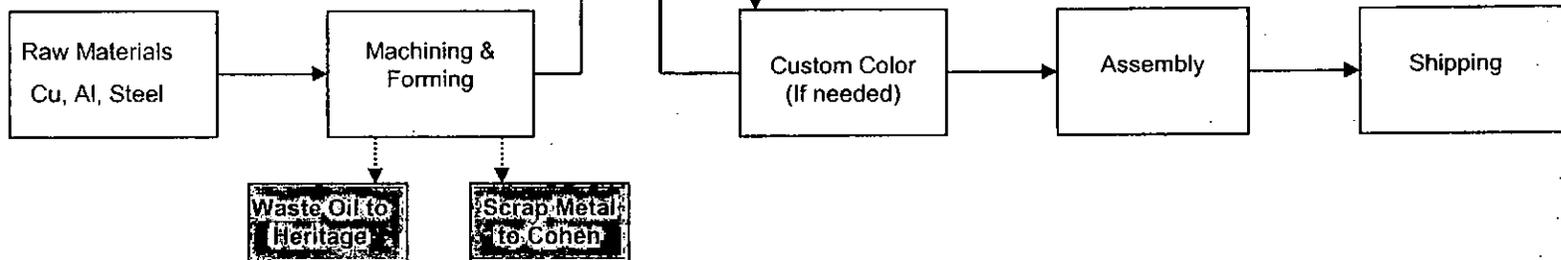
REQUIRED FOLLOW-UP ACTIONS

Process Schematic – Schneider Electric

Busways

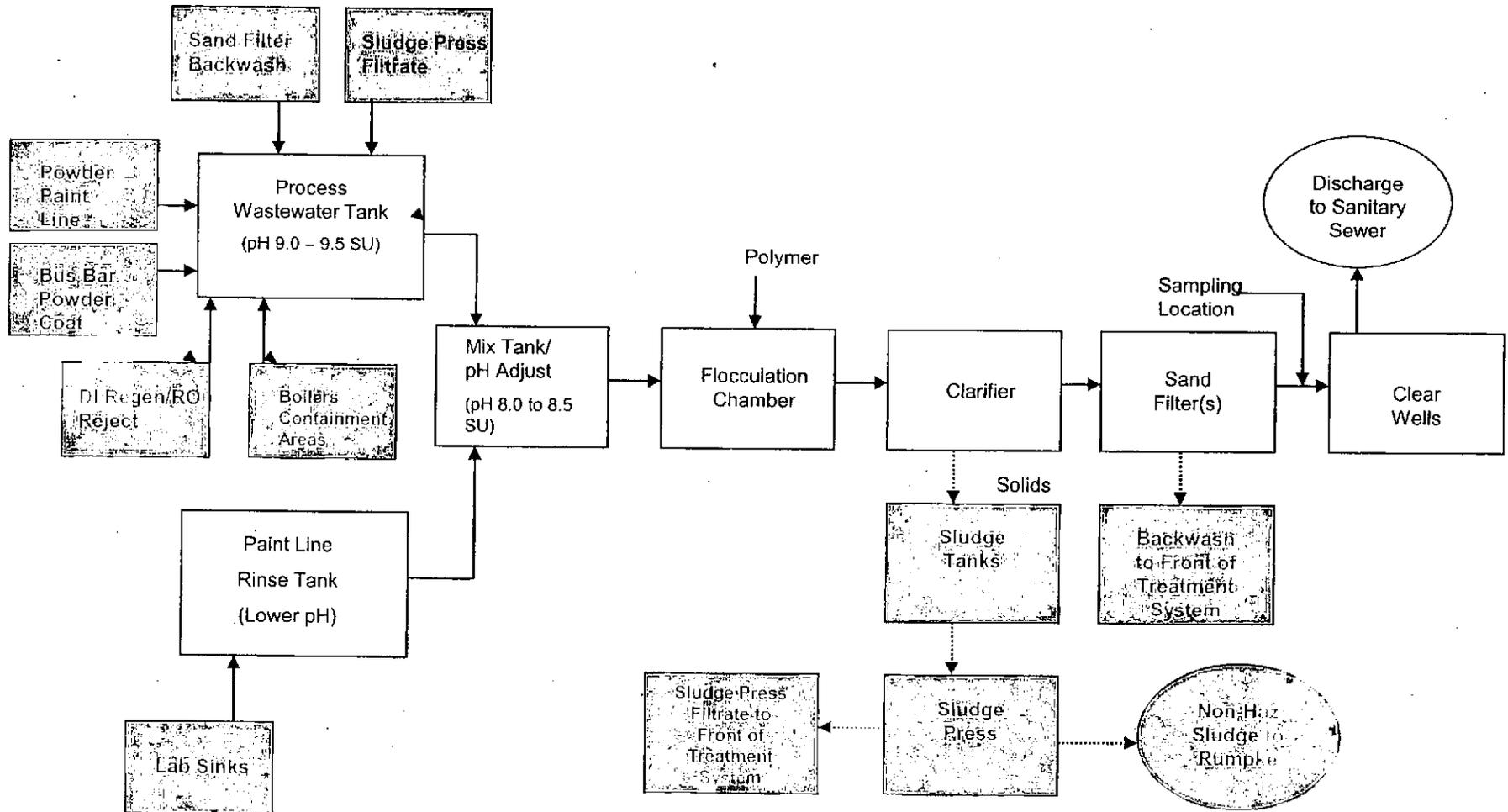


Fuse, Switch Boxes, Etc.



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Pretreatment Schematic Schneider Electric



July 8, 2008