Environmental Protection Agency

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

June 28, 2010

RE: Pretreatment Compliance Inspection and Notice of Significant Non-Compliance

Ms Debbie Stultz
Beach Manufacturing Company
PO Box 870
St. Paris, OH 43072

Dear Ms. Stultz:

On June 17th I met with Eliot Baggs, Dee Harvey and you to conduct a pretreatment compliance inspection. Beach Manufacturing Company (Beach Mfg) is in violation of Ohio Administrative Code 3745-36-03 for failing to submit an application for renewal of its Indirect Discharge Permit that expired February 28, 2010; renewal applications are due 180 days prior to permit expiration. Mr. Baggs indicated that he would work to submit the renewal application very soon. Beach Mfg is also in Significant Non-Compliance (SNC) for failing to report monitoring results for the period of January through June 2009. Recent correspondence with James Roberts in our Central Office revealed the steps you need to take address the reporting errors that have caused the violations. I did note that Beach Mfg is conducting the required monitoring and has analytical reports that indicate compliance with discharge limits.

Process Flow

During our walk-through of the paint prep line I noted that the fresh water feed rate meter on the water rinse following alkaline cleaning was reading between 3 and 4 gallons per minute. This flow, along with the approximately 1 gpm overflow from the fluorozirconic acid rinse tank (stage 5) is not consistent with the total facility flow reported to be less than 900 gpd. The discrepancy is even greater when the fact that reported flows are based on readings of the meter that measures total water consumed by the facility which includes a significant percentage that is reject water from the reverse osmosis system and regeneration water from the softener system. Please review the operation of the paint prep line and provide an explanation for the apparent discrepancy in observed versus measured flows.

Dilution Prohibited

You described the practice of dumping the contents of the 1,150-gallon fluorozirconic acid tank that occurs approximately every six months as being done at the same time as the subsequent rinse tank. This rinse tank is dumped every two weeks and is coordinated with the fluorozirconic acid tank dump to help provide dilution. This practice is allowable because both waters are regulated process waters. However, your additional practice of adding city water to the fluorozirconic acid tank as it is draining is dilution which is prohibited by the National Pretreatment Rules.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

40 CFR, Part 403.6 (d), *Dilution Prohibited as Substitute for Treatment,* states:

> "Except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement.

In the future, you must cease adding fresh water to the fluorozirconic acid tank when the tank drain is open.

Documentation of Sampling Events

For the fourth consecutive year I ask that you have your contract laboratory document the following information on the chain of custody sheet for each monitoring event:

- The start and stop time for composite samples
- The frequency and volume of aliquot collection (e.g. 100 milliliters every 20 minutes); and
- The volume of collected composite sample (prior to portioning into analysis bottles)

This information is critical to being able to determine the acceptability of your compliance monitoring and I urge you to consider alternate service providers if this deficiency continues,

Please provide a written response to this inspection letter by July 19, 2010 indicating your intentions to address the items I have presented. If you have any questions please call me at (937) 285-6095.

Sincerely,

Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURE

CC: Elliot Baggs – Beach Mfg.
Ryan Laake – Ohio EPA / Central Office / DSW
Rodney Callison – Village of Saint Paris

Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

outhwest District Office

PERMIT NUMBER	PERMIT APPLICATION NUMBER	DATE CONDUCTED
*1DP00001*CP*	*OHP000011*	*June 17, 2009*

INSPECTION TYPE	INSPECTOR	FACILITY TYPE	TIME IN	TIME OUT
I	*S*	*2*	*0900*	*1010*

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY	POTW RECEIVING DISCHARGE
Beach Manufacturing Company ***500 S. Springfield Street*** ***St. Paris, OH 43072***	***Village of St. Paris WWTP***
MAILING ADDRESS OF FACILITY	
Beach Manufacturing Company ***PO Box 870*** ***St. Paris, OH 43072***	***Mr. Elliot Baggs*** ***Beach Manufacturing Company*** ***PO Box 129*** ***Donnelsville, OH 45319-0129***

CONTACT (NAME/TITLE/PHONE/E-MAIL)
Ms. Debbie Stultz / Plant Manager / (937) 663-5531 / debbiestultz@beachmfgco.com

FACILITY EVALUATION (See Inspection letter for more complete description)

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

S	Sampling Procedures	*NA*	Compliance schedule requirements
U	Reporting *(1)*	*NA*	Notification
S	Compliance with effluent limits *(2)*	*U*	Other – ***Failure to submit permit renewal application***

(1) No data has been submitted for January through June 2009. (2) Analytical reports on-site show compliance

lame and Signature of Inspector(s)	Agency / Office / Telephone	Date
Matt Walbridge	***Ohio EPA / Southwest District Office / (937) 285-6095***	6-28-10
ignature of Reviewer	***Ohio EPA / Southwest District Office / (937) 285-6034***	Date 6/29/10

INDUSTRIAL USER INSPECTION CHECKLIST

Facility ***Beach Manufacturing Company***

Date of inspection: ***June 17, 2010***

Permit Application Number: ***OHP000011***

IDP Number: ***1DP00001*CP***

Facility Representative: ***Ms. Debbie Stultz***
Mr. Eliot Baggs
Ms. Dee Harvey

Inspector(s): ***Matt Walbridge***

COMPLIANCE

1. Date of last pretreatment inspection: ***June 4, 2010***

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

As was the case in the previous two inspections, this determination is based on observing analytical lab reports. Although monitoring results exist, they are missing from Ohio EPA's reporting system for the period of January through June 2009.

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:

No self-monitoring results reported for the period of January through June 2009.
Failure to submit a permit renewal application.

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

<u>Continue</u> to need to record the volume of collected sample to ensure that it is consistent with expectations.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***~11***

6. Shifts/Day: ***1***

7. Production Days/~~Year~~ week : ***4*** ***(sometimes 5)***
(Two weeks off at the beginning of July and approximately a week off in December)

8. Hours/shift: ***8***

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

(Mostly truck components from hot and cold-rolled steel)

10. General facility description and operations:

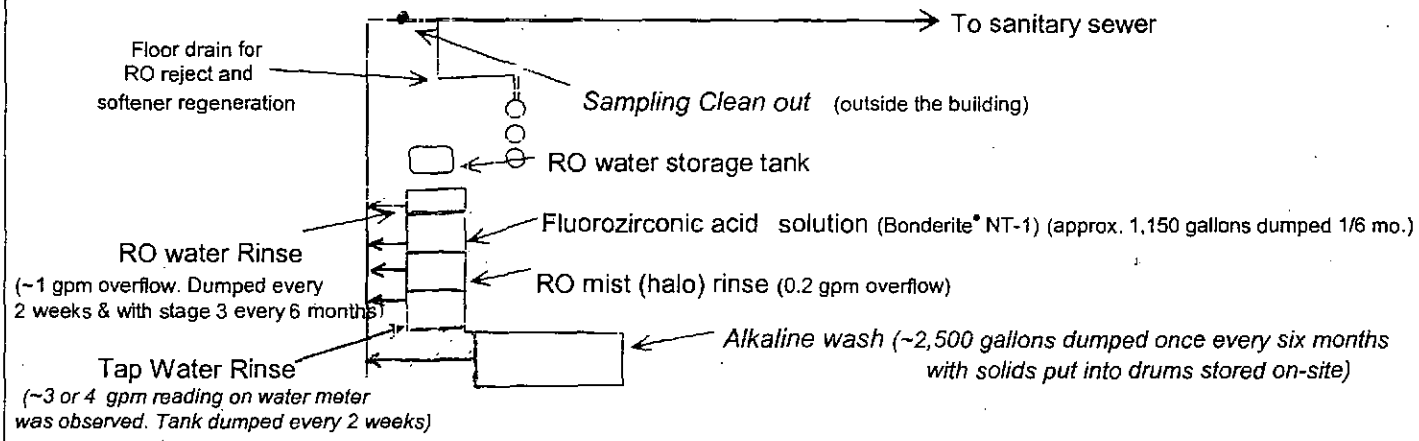
Job Shop parts washing and painting operation (powder coat).

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:



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

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

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

PTI Number: Date:

16. What is the treatment mode of operation? ***N.A. (No treatment)*** ~~Batch / Continuous / Combination~~

If batch, list the frequency and duration:

17. Who is responsible for operating the ~~treatment~~ system?

Dee Harvey

18. How often is the treatment system checked?

Stages are checked three times throughout the day.
(Flow rates, spray patterns, conductivity, pH, chemical titrations)

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

High level alarms on all tanks except rinse tank.

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

There is a 'Line Check Sheet' for the production process line that is kept at the line.

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

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

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

Was the POTW notified? ***N.A.*** ~~Y / N~~

23. Are residuals or sludges generated? Y /~~N~~

Fluorozirconic acid solution tank is drained approximately every 6 months (they indicated that the contents are 'diluted' at the time of discharge because of pH. This is done by dumping the stage 4 rinse tank at the same time and by adding fresh city water to the fluorozirconic acid tank as it is draining).

Alkaline Cleaner tank is drained out once per month and cleaned once per year. Draining includes neutralization with 'cupfuls' of soda ash to pH ~8 and then drained to sewer overnight.

Approximately every year, solids are vacuumed out of the alkaline cleaner tank for storage on-site (done in-house). Eventually, the drums of solids are hauled off-site for disposal. I suggested they look into dewatering the solids and possibly disposing the solids with their solid waste.

Method of disposal:

Drums and tank contents to Heritage Crystal Clean

Frequency and amount of disposal:

Fluorozirconic acid solution tank is drained every 4 to 6 months. (Tested for metals once in Oct. '05)

Alkaline cleaner tank (~2,350 gallons) is drained to sewer approximately once per six months.

Solids from alkaline cleaner tank are hauled off-site approximately once per year.

Name of hauler/landfill/disposal facility:

Heritage Crystal Clean

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

If land applying sludge, is there a sludge management plan? ***N.A.*** ~~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
1. Alkaline Wash Tank		Not Limited	2,350 gal 1/6 mo.	N.A.	N.A.
2. Tap Water Rinse (metered at ~3-4 gpm) (3)			~1,680 gpd and 1,220 gal dump 1/mo.	N.A.	N.A.
3. RO water Rinse (~0.2 gpm)			~100 gpd and 2,440 gal dump 1/mo.	N.A.	N.A.
4. Fluorozirconic Acid Tank			1,100 gal dump every 6 months	N.A.	N.A.
5. RO water Rinse (metered at ~1 gpm)			~480 gpd and 1,000 gal dump every two weeks.	N.A.	N.A.
Total Regulated Process Flow	Clean out located in the alley	Not limited	~2,260 (1)		
Noncontact Cooling	-	-	-		
Boiler Condensate	-	-	-		
Reverse Osmosis	-	-	ND (2)		
Demineralizer Regeneration	-	-	-		
Softener Regeneration	-	-	ND (2)		
Filter Backwash	-	-	-		
Compressor Condensate	-	-	-		
Storm water	-	-	-		
Total of Dilute Flows	N.A.	N.A.	ND (2)		
Unregulated Flows	N.A.	-	-		
Sanitary	N.A.	N.A. (1)	N.A. (2)		
TOTAL FLOW	N.A.	N.A.	~2,260 (1)(3)		

(1) Reported flow, which is taken from the meter that measures total water usage, averages ~500 gpd so regulated process flow should be about 30 % less because of the RO reject rate. This puts process flow at about 350 gpd. This disparity needs to be investigated.

(2) Only process wastewater is present at the sampling point. Sanitary, RO reject and Softener regeneration are discharged via a separate line.

(3) This flow rate (3.5 gpm for 8 hours equals 1,680 gallons) does not support the reported flow

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

SELF MONITORING

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

"Samples shall be collected from the cleanout located outside of the south wall of the main building prior to the effluent mixing with sanitary flow."

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~~

Main water meter is said to be used. Readings are taken at the beginning and end of sampling events. These readings are around 500 gpd but if observed flows were to occur during the 8-hour work day, flow should be ~2,000 gpd.

If measured, how often is the meter calibrated?

Flow meters have been installed on the feed lines to stages 2, 3 and 5.

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:
'Cindy' of Advanced Analytics

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 ***(flow rates are constant so time-proportioned samples should be adequate)*** ~~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: ***Advanced Analytics***

TOXICS MANAGEMENT

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

Touch-up primer & paint and xylene-based solvent.

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? ***N.A.*** ~~Y / N~~

39. Identify any potential slug load or spill areas:

None

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

- ***Must submit overdue permit renewal application.***
- ***Must submit missing monitoring data for period of January through June 2009 ASAP.***
- ***Must not allow city water to be added during dumping of Fluorozirconic acid tank (dilution to comply is prohibited)***
- ***CONTINUE to need to record the volume of the composite sample on the chain of custody sheet.***
- ***Need to reconcile disparity in reported/observed flows.***

OBSERVATIONS

- ***Sample period is 24-hours. At the end of the 8-hour work day, all water to the production line is shut off with a solenoid valve. Automatic composite sampler continues to attempt to pull aliquots.***
- ***It would be nice to have a good water balance for this facility to account for water treatment flows and evaporative losses.***
- ***Currently operating about 4 days per week.***
- ***Permit needs to require monitoring when discharges from at least the alkaline wash and fluorozirconic acid tanks are being dumped.***