



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 18, 2008

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

Ms Debbie Stultz
Beach Manufacturing Company
100 Mill Street
St. Paris, OH 43072

Dear Ms. Stultz:

On June 30, 2008 I met with you to conduct a pretreatment compliance inspection. I appreciate you accommodating me on short notice. Most notable from the inspection was the revelation that Beach Manufacturing has not reported any monitoring results since May 2007. It is this failure to report that has put Beach Manufacturing in Significant Non-Compliance (SNC). By the end of the inspection it became evident that sampling results are available and you indicated that you were not made aware of Beach's reporting obligations after Mr. Fairchild left the company. To remedy this deficiency, you will need to establish an account with Ohio EPA's electronic Discharge Monitoring Report (e-DMR) system and submit the missing monitoring reports as soon as possible but by no later than August 15th. To get you synchronized with the reporting periods e-DMR uses, you will need to submit one report that includes only data for June 2007, one report that covers the months of July through December 2007 and one report for the period of January through June 2008. This new reporting requirement supersedes what is contained in your indirect discharge permit. Information about how to establish an e-DMR account can be found on our website at: <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

There are several outstanding issues from my inspection findings last year that you will need to address and they are as follows:

1. The volume of collected sample (prior to portioning into analysis bottles) needs to be recorded on the chain of custody sheets.
2. Please verify the water balance for your process flow diagram on page 2 in the attached inspection form. I noted that the flow meter for stage 2 was showing 4 gpm when previous observations noted approximately 1 gpm. You may want to check this stage to determine whether it is using an excessive amount of water.

Ms. Debbie Stultz
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Finally, I am concerned about your facility's compliance during times when the alkaline cleaner and fluorozirconic acid tanks are periodically dumped. To address this concern, I ask that you arrange to conduct one of your required sampling events when these discharges are occurring. Alternately, you can collect a sample of the fluorozirconic acid tank immediately prior to it being dumped and submit the results under separate cover. Analysis should be provided for cadmium, chromium, copper, lead, nickel, silver and zinc. Please note that when your permit comes up for renewal I plan to add a monitoring condition requiring that at least one monitoring event occur during process tank dumps.

Please provide a written response to this inspection letter by August 1, 2008 indicating your intentions to address the items I have presented. If you have any questions about this letter, or about how to register with the e-DMR system, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURE

CC: Julia Zhang – Ohio EPA / Central Office / DSW
Rodney Callison – Village of Saint Paris



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

PERMIT NUMBER
1DP00001*CP

PERMIT APPLICATION NUMBER
OHP000011

DATE CONDUCTED
June 30, 2008

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1430

TIME OUT
1510

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**Beach Manufacturing Company
100 Mill Street
St. Paris, OH 43072**

POTW RECEIVING DISCHARGE

Village of St. Paris WWTP

MAILING ADDRESS OF FACILITY

**Beach Manufacturing Company
118 N. Hampton Road
Donnelsville, OH 45319-0129**

CONTACT (NAME/TITLE/PHONE)

**Ms. Debbie Stultz / Plant Manager / (937) 663-5531
debbiestultz@beachmfqco.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
ND	Compliance with effluent limits (1)	NA	Other -

No data has been submitted since May 2007

Name and Signature of Inspector(s)

Matt Walbridge

Agency / Office / Telephone

Ohio EPA / Southwest District Office / (937) 285-6095

Date

7-18-08

Signature of Reviewer

Matt Walbridge

Ohio EPA / Southwest District Office / (937) 285-6034

Date

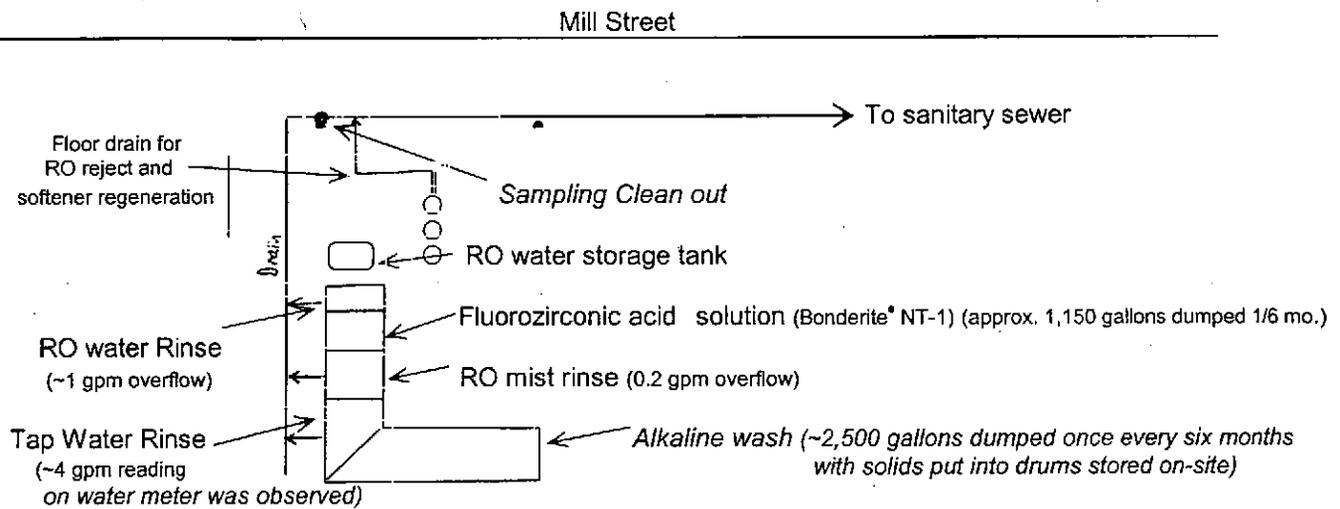
7/21/08

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:



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)**

WASTEWATER TREATMENT CONTINUED

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 every 4 to 6 months (they indicated that the contents are 'diluted' at the time of discharge because of pH).
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.*

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 month.
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			2,350 gal 1/mo.	N.A.	N.A.
2. Tap Water Rinse (~1 gpm but it is not metered)			~480 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 1/ six mo.	N.A.	N.A.
5. RO water Rinse (fresh water is metered in at ~4 gpm)			~480 gpd and 1,000 gal dump 1/mo.	N.A.	N.A.
Total Regulated Process Flow	Clear out into the alley	Not limited	~1,100		
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		
Unregulated Flows	N.A.	-	-		
Sanitary	N.A.	N.A. ⁽¹⁾	N.A. ⁽²⁾		
TOTAL FLOW	N.A.	N.A.	~1,100 ⁽¹⁾⁽²⁾		

(1) Reported total flows are averaging ~900 gpd so regulated process flow should be about 30 % less because of the RO reject rate. This puts process flow at about 550 gpd.

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

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.

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? Y / ~~N~~
 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 missing monitoring data using e-DMR for the period of June 2007 to present.*
- *Continue to need to record the volume of the composite sample on the chain of custody sheet.*
- *Need to investigate method for reporting daily wastewater flow values. Old method relied on taking water meter readings but with new water softening and reverse osmosis systems that discharge through a separate outfall (water that ends up as RO reject is a significant percentage of the total flow), the water meter no longer seems appropriate. The flow meter readings on the feed water line(s) to stages 2, 3 and 5 would seem to be a little better except that they don't account for water lost to evaporation.*

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.*
- *It would be nice to have a good water balance for this facility to account for water treatment flows and evaporative losses.*
- *Permit needs to require monitoring when discharges from at least the alkaline wash and fluozirconic acid tanks are being dumped.*
- *I was informed that when the fluozirconic acid tank is dumped, it is diluted with water because of its low pH. They must show that the contents of this tank are compliant with effluent limits before dilution or discharge so they aren't in violation of the prohibition against dilution as a means of compliance.*

