OhioEPA
State of Ohio Environmental Protection Agency
Southwest District

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

October 2, 2007

Ms. Judy Filson
American Showa, Inc. – Blanchester Plant
3343 State Route 28
Blanchester, Ohio 45107

Re: American Showa, Inc. - Blanchester – Annual Inspection – 2007
NOTICE OF VIOLATION

Dear Ms. Filson:

On August 28, 2007, I conducted the annual pretreatment inspection at your facility. The facility was represented by you. The facility is considered to be a significant industrial user under Ohio Administrative Code (OAC) 3745-36-02(U)(2) which states, "Any other user that:...is designated as such by the director on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement." The inspection covered the casting areas, machining and assembly area, the pretreatment system, and the oil recycling area.

The facility has been in compliance with its permit at the time of the inspection. However in September, there was an Oil and Grease violation. The facility has since returned to compliance. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

American Showa, Inc. (ASI) manufactures steering components and pumps. As part of the manufacturing process, casting, machining, and assembly work are done.

Process Discharges and Pretreatment

Since the last inspection, the rack line installation was completed. All of the casting machines at the facility are on a chiller cooling system. The chiller system does not have a discharge to the Village of Blanchester. The water from this closed loop system is disposed of off-site by Ultra. The quench waters are also disposed of off-site.

Storage Areas

The used oils/coolants are recycled on-site at the facility. There are two separate systems for the two products that are used in machining. Because of insurance reasons, the plastic tanks that were used in the system were replaced with stainless steel tanks. In addition, a new diked spill containment area was also built. The functioning of the system has not changed.

There are two separate roll-off boxes for the steel and aluminum scrap. These roll-off boxes are covered. The sumps that collect the waste coolant from the material are pumped back into a sump in the building for recycling.

The dross from the casting process is stored in metal bins at the far end of the machining area. This material is manifested off-site for disposal as a hazardous waste.

Sampling

The facility is sampling as required. All of the parameters requiring sampling were done. ASI has changed its sampling location, and the indirect discharge permit has been modified to reflect this change. The samples are now being collected at an end-of-pipe location in the fire pit area. All of the process flows are present there. This is where the facility has been sampling for the Village. The facility is now listing the preservation methods on its chain-of-custody forms.

The following violation was noted in the facility's sampling:

Station No. 1DP00000001

Parameter	Code	Date	Reported	Units	*Permit* Limit
Oil & Grease	00552	09/07	60.9	mg/L	50 mg/L

Please be advised that failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. The reason for the violation has already been provided, and resampling has shown compliance.

Storm Water Discharges

The facility has coverage under the general industrial storm water permit.

The assistance you provided 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

Enclosures

Cc: Ken Wilson, Blanchester
Greg Dahnke, American Showa
Julia Zhang, DSW/CO

OhioEPA

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
1DP00000*DP	OHP000006	08/28/2007	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
American Showa, Inc. 3343 State Route 28 Blanchester, Ohio 45107-9550	9:20 am	06/01/2004
	Exit Time	**Permit Expiration Date**
	10:25 am	05/31/2009
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Judy Filson, Safety & Environmental Manager	937.783.4961x359	
POTW Receiving Discharge	**Categorical Standard(s) or Other Classifcation**	
Village of Blanchester WWTP	Potential to Adversely Impact the POTW	

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
10/2/07	10/2/07
Marianne Piekutowski Date Division of Surface Water Southwest District Office	Martyn Burt Date Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***American Showa, Inc.*** Date of inspection: ***August 28, 2007***

OH Number: ***OHP000006*** IDP Number: ***1DP00000*DP***

Facility Representative: ***Judy Filson*** Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***August 3, 2006***

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

There was one Oil & Grease violation in September 2007. This inspection will also serve as the Notice of Violation for this event. Subsequent sampling showed the facility to be in compliance.

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:

The facility is now noting the preservation methods as required.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***750*** 6. Shifts/Day: ***3***

7. Production Days/Year: ***300 (6 day work week)*** 8. Hours/shift: **8**

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

Rack line #2 equipment is now operational. This does not impact the volume of wastewater. There may be additional production changes proposed during the next year, but there has been nothing finalized. The VGR line that was installed as part of the rack line is also operational. There were no drains put in with the new equipment.

10. General facility description and operations:

Produce power steering components, gear boxes and pumps for automobiles. Die casting, machining and assembly are the primary manufacturing operations.

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:

The facility is still looking at bring in a new customer. There may be a small addition put in off of casting to store sand core, ingot , and casting materials.

WASTEWATER TREATMENT

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

Oil skimming, polymer addition, gravity separation.

See attached schematic.

Clay polymer treatment system is in use. The two oil skimmers are being used on existing tanks. There is only a small amount of flow associated with the Power Steering Manufacturing. This is usually recycled. If the centrifuge is down, then this would go to waste treatment.

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: ***NA*** Date: ***NA***

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

    If batch, list the frequency and duration:
Wastewater is generated 24 hours a day, but treatment occurs for 8 hours a day on third shift (10:00pm to 7:00 am). The separation system operates on a continuous basis during this time. The clay/polymer system operates in batches during third shift.

17. Who is responsible for operating the treatment system?
Judy Filson and Chuck Pendergraft.

18. How often is the treatment system checked? ***Hourly.***

WASTEWATER TREATMENT CONTINUED

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

High level alarms on sumps and tanks.

20. Is there an operations and maintenance manual? ***Yes for the clay/polymer system.*** ~~Y~~ / ~~N~~

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

Pumps.

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:
Recycle aluminum and steel turnings from machining operations.
Recycle metal sludge from machining coolant.
Waste oil to used oil tank (recycled).

Frequency and amount of disposal:

Machine turnings; Unknown
Metal sludge from coolant: Unknown
Waste oil: ~2,000 gallons per month

Name of hauler/landfill/disposal facility:

Aluminum and steel go to Quantum.
Oil goes to Enterprise Oil (Located in Tennessee).
Coolant sludge goes to Quantum.
Is any sludge generated subject to RCRA regulations? Y /~~N~~

The facility is now a conditionally exempt hazardous waste generator.

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 LOCATIION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
Cast Quenching		288	(1)		
Heat Treat Quench (Ultra hauls off)		NA	0	NA	NA
Total Regulated Process Flow		0	0		
UNREGULATED PROCESSES					
Cart & Floor Washing	*End-of-Pipe*	*1,400(2)*	*1,400(2)*		
Parts Washing	*End-of-Pipe*	*520(2)*	*1,730(3)*		
Machining Coolant (recycle coolant 8,000 gal/mo)	*End-of-Pipe*	*390(2)*	*390(2)*		
Total Unregulated Process Flow		*2,310(4)*	*2,310(4)*		
Non-Contact Cooling		*Not factored in permit limits.*	(5)		
Blowdown		--	--		
Reverse Osmosis		*Not factored in permit limits.*	*Unknown(6)*		
Demineralizer Regeneration		*Not factored in permit limits.*	--		
Softener Backwash		*Not factored in permit limits.*	--		
Boiler Condensate		*Not factored in permit limits.*	--		
Compressor Condensate		*Not factored in permit limits.*	--		
Sanitary		*Not factored in permit limits.*	*~10,000*		
TOTAL DILUTE FLOW		"	(5)		
TOTAL FLOW		*3,998*	*5,500(7)*		

(1) ~50 gal. Twice a year during shutdown. Hauled off-site.
(2) Permit application lists these flows. Permit based on Metal Finishing flow of 2700 gpd but qualifying MF operations are no longer present. Flows are not measured.
(3) These are dumped once a week. Flows are not measured.
(4) Flows are not measured.
(5) Unknown. Believed to be <200 gpd.
(6) Not present at sampling point.
(7) Actual reported flow are approximately 5,670 gpd which is based on a controlled discharge.

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).
Occasionally, process wastewater from heat treat quench and cast quench is hauled off-site for treatment and disposal, but it is a small volume and is infrequent. The facility has coverage under the general industrial storm water permit.

SELF MONITORING

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

The samples are collected in the fire pit at the Village's monitoring port.

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?
A new flow meter was installed in June 2003. Data is recorded onto a floppy disk. It is calibrated every six months.

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:

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 ***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: ***Advanced Analytics Laboratories in Columbus***

TOXICS MANAGEMENT

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

Parts washing solvent used in manufacturing, casting and maintenance departments contains 1,2,4-Trimethylbenzene. This is taken off-site for recycling by Crystal Clean. The facility is looking into a water-based material.

36. Does the facility have a current toxic organic management plan(TOMP)? ***NA*** ~~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~~

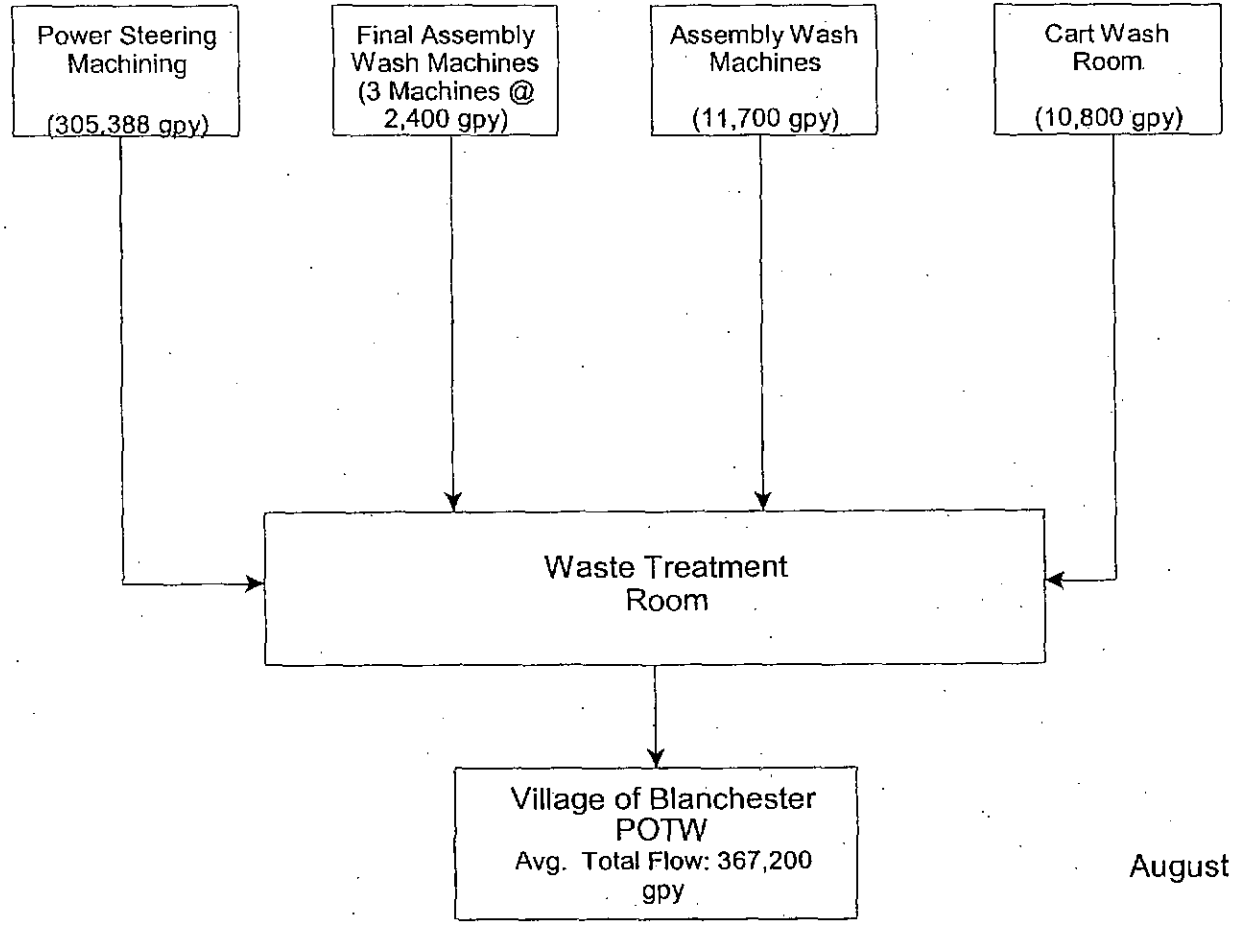
39. Identify any potential slug load or spill areas:

No reasonable potential. The facility maintains a slug/spill plan for its ISO 14001 certification.

REQUIRED FOLLOW-UP ACTIONS

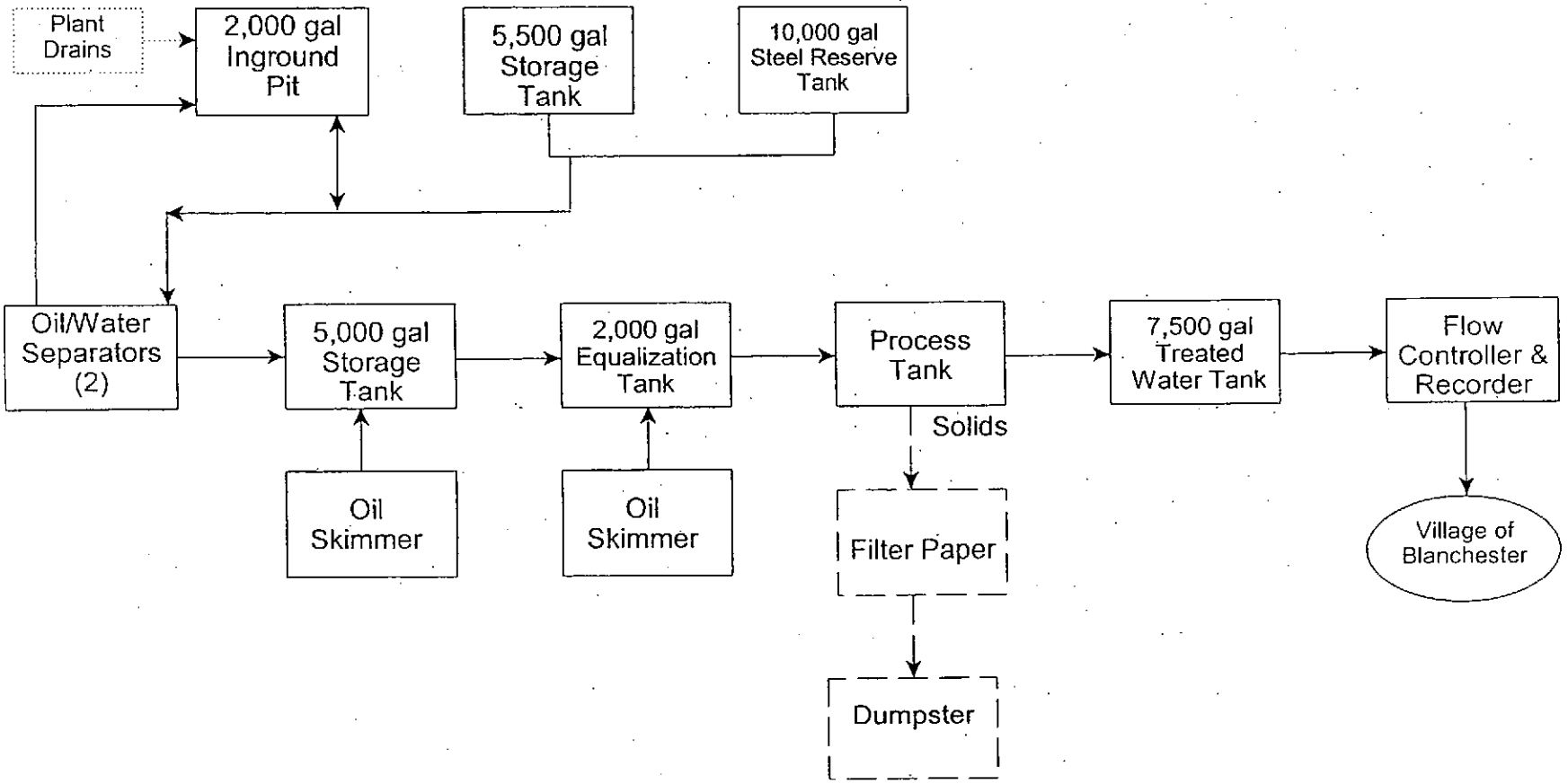
None.

American Showa Blanchester Plant Process Flow Schematic



August 26, 2004

American Showa Blanchester Plant Pretreatment Schematic



September 8, 2005