



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Dayton, Ohio 45402

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

July 16, 2009

RE: Pretreatment Compliance Inspection and  
Notice of Violation

Mr. Robert Dietrich  
Midmark Corporation  
PO Box 286  
Versailles, OH 45380

Dear Mr. Dietrich:

On June 24, 2009 I met with Larry Martino and you to conduct a wastewater pretreatment inspection. A review of your self-monitoring reports from July 2008 through June 2009 revealed no reported violations of the limits in your Indirect Discharge Permit; thank you for your continued compliance.

However, I noted that your sampling records indicate time-proportional samples are being collected instead of flow-proportional samples as required by your permit (see Definitions in Part III, 1). It is necessary for you to make immediate arrangements to ensure future sampling is done using flow-proportional techniques. Please inform me when you have completed this work. I would be interested in knowing how the sampler is programmed.

There is typically about a six-hour gap in operations between the day and night shifts but a review of the flow chart showed there to be flow in-between shifts like it did at the end of the week. This flow would be collected by a sampler (more so using time-proportional sampling) and would be considered to dilute the sample. To help ensure that no rinse water is inadvertently left running during these between-shift periods, consider installing a master shut-off switch on the RO water system or some other control mechanism. Please let me know how you plan to address this issue.

Finally, I continue to ask that you have the composite sample volume, prior being poured into containers that are sent for analysis, documented on the chain of custody sheets.

Please provide a written response to this inspection letter stating your intentions to address my findings. If you have any questions about this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,

Matt Walbridge  
Pretreatment Coordinator  
Division of Surface Water

ENCLOSURE

CC: Mark Voisard - Village of Versailles  
Ryan Laake - Ohio EPA /Central Office / DSW



Ohio Environmental Protection Agency

# PRETREATMENT INSPECTION REPORT

PERMIT NUMBER  
**1DP00047\*BP**

FACILITY NUMBER  
**OHP000201**

DATE CONDUCTED  
**June 24, 2009**

INSPECTION TYPE  
**I**

INSPECTOR  
**S**

FACILITY TYPE  
**2**

TIME IN  
**1230**

TIME OUT  
**1340**

## GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**Midmark Corporation - Plant B  
60 Vista Drive  
Versailles, OH 45380**

POTW RECEIVING DISCHARGE

**Village of Versailles**

MAILING ADDRESS OF FACILITY

**Midmark Corporation - Plant B  
PO Box 286  
Versailles, OH 45380**

CONTACT (NAME/TITLE/PHONE)

**Robert Dietrich / Safety & Environmental Manager / (937) 526-8291**

## FACILITY EVALUATION (See Inspection letter for more complete description)

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

<b>U</b>	Sampling Procedures	<b>NA</b>	Compliance schedule requirements
<b>S</b>	Reporting	<b>NA</b>	Notification
<b>S</b>	Compliance with effluent limits		Other -

Name and Signature of Inspector(s)  Matt Walbridge	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6095</b>	Date <b>7-16-09</b>
Signature of Reviewer 	<b>Ohio EPA / Southwest District Office / (937) 285-6034</b>	Date <b>7/17/09</b>

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Midmark Corporation - Plant B**

Date of inspection: **June 24, 2009**

OH Number: **OHP000201**

IDP Number: **1DP00047\*AP**

Facility Representative: **Robert Dietrich, Larry Martino**

Inspector(s): **Matt Walbridge**

### COMPLIANCE

1. Date of last pretreatment inspection: **June 25, 2008**

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

3. Is the facility in compliance with all other requirements? Y / ~~N~~ / NA  
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:

**None**

### FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~170 in Plant B (650 total)** 6. Shifts/Day: **2 (as of January 2009)**

7. Production Days/Year: **~286 (5 days/week)** 8. Hours/shift: **8**  
**One week off in December between Christmas and New Years**

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

**Production volume is down about ~20%.**

10. General facility description and operations:

**Manufacture medical exam tables, dental chairs, sterilizers and casework. Operations include welding, machining, tumbling, painting and assembly.**

**FACILITY OPERATIONAL CHARACTERISTICS - CONTINUED**

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

*Use of Duratec 100 in stage 3*

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

*Compressors and vacuum production will be coming from their New York facility in July '09.*

**WASTEWATER TREATMENT**

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

*There is no treatment system. All regulated process wastewater enters a sump located at the end of the paint line. The sump discharges to the sanitary sewer.*

14. Was a PTI issued for the treatment system? NA Y / N

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

If yes, was a PTI obtained? NA Y / N

PTI Number:

Date:

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

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system sample collection?

*Robert Dietrich coordinates with Belmont Labs.*

18. How often is the treatment system checked?

*NA*

WASTEWATER TREATMENT - CONTINUED

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

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

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

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

Have bypasses occurred since the last inspection? NA Y/N

Was the POTW notified? NA Y/N

23. Are residuals or sludges generated? Y/N

Method of disposal:

***The entire contents of stages 1 and 3 are pumped out and hauled off-site for disposal.***

***They are going about six months between pumping but are looking to go longer.***

Frequency and amount of disposal:

***Tank cleanings occur about once every six months. The volume is approximately 5,000 gallons.***

Name of hauler/landfill/disposal facility:

***Since December 2006 Clean Water Ltd. pumps out and hauls away the contents of stages 1 and 3.***

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

***Sludge is not a listed hazardous waste and analysis results show that it is not characteristically hazardous.***

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
1. Alkaline Wash (stage 1)		~4,000 gallons dumped to sewer quarterly (1)	~4,000 gallons hauled off-site every 6 months	NA	NA
2. RO Rinse (stage 2)		~ 935 gpd to sewer with ~1,500 gallons dumped monthly	~2.5 gpm overflow to drain with ~1,500 gallons dumped quarterly		
3. Fluorozirconic Acid (stage 3)		~2,200 gallons dumped to sewer quarterly (1)	~2,200 gallons hauled off-site every 6 months		
4. RO Rinse (stage 4)		~ 935 gpd to sewer with ~1,500 gallons dumped quarterly	~2.5 gpm overflow to drain with ~1,500 gallons dumped quarterly		
5. RO Halo Rinse (stage 5)		~1,100 gallons dumped to sewer monthly	~5 gpm overflows to Stage 4. ~1,100 gallons hauled off-site quarterly		
6. RO Halo Rinse (stage 6)			~5 gpm virgin feed flows into stage 5		
7. Vibratory Tumbler		~ 35 (2)	~ 35 (2)		
Total Regulated Process Flow	ump at final cutoff	~3,035 gpd to sewer with ~10,300 gallons dumped to sewer quarterly	~5,000	(1) Midmark plans to continue having the contents of stages 1 and 3 pumped out and hauled off-site for disposal. Permit was modified to allow discharge with EPA approval. (2) There is a 35-gallon sump that serves this operation. Flows are listed at ~200 gal/mo. but are not present at the sampling point. (3) Based on flows recently reported (4) RO reject and softener regeneration are not present at the sampling point. RO reject flow is estimated at 3 gpm.	
Noncontact Cooling		-	-		
Boiler Condensate		-	-		
Reverse Osmosis		-	ND (4)		
Demineralizer Regeneration		-	ND (4)		
Softener Backwash		-	-		
Filter Backwash		-	-		
Compressor Condensate		-	-		
Storm water		-	-		
Total of Dilute Flows		0	0		
Unregulated Flows		0	0		
Sanitary		0	0		
TOTAL FLOW		~3,035 gpd to sewer with ~10,300 gallons dumped to sewer quarterly	~5,000(3)		

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

NA

**SELF MONITORING**

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

***"Samples shall be collected from the flow meter flume prior to wastewater entering the paint line discharge pit."***

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:

***Sampling from at the flow meter flume is ideal although the very small and very intermittent flow from the vibratory tumblers is not part of the discharge flow during sampling events.***

29. Is the flow measured or estimated? Measured / ~~Estimated~~

If measured, how often is the meter calibrated?

***Not a scheduled event. There is a scale on the flume that is periodically compared to the bubbler readout. A calibration was done by an outside firm in late 2007.***

If estimated, describe method of estimation:

30. Is pH monitored continuously? ~~Y~~ / N

If yes, how often is the meter calibrated? **NA**

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

***Belmont Labs. Sampler is typically set up on Tuesdays, a composite sample is collected Wednesday and the sample is picked up by Belmont on Thursday.***

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 proportional at 133 ml every 30 minutes*) Y / ~~N~~  
 Proper preservation techniques (*sample jars are pre-preserved*) 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: **Belmont Labs**

**TOXICS MANAGEMENT**

35. Are any listed toxic organics used in the facility? Y/N  
If yes, identify organics:  
  
***Safety-Kleen 105 containing: Ethylbenzene, Toluene, Tetrachloroethylene and Trichloroethane***  
***Aerosol Paint containing: Ethylbenzene and Toluene.***  
***Sliaprene Adhesive containing: Toluene***  
***Laminate Contact Adhesive containing: 1,1,1 Trichloroethane***
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? NA Y/N
39. Identify any potential slug load or spill areas:  
  
***None identified***

**REQUIRED FOLLOW-UP ACTIONS**

*See inspection letter.*

**GENERAL OBSERVATIONS**

- *The flow meter was showing 5.4 gpm. 24-hour flow the previous day was 5,000 gpd.*
- *Chain of custody sheets need to include when sampling events start and stop and the sample volume.*
- *Auto-sampler is currently programmed to collect 133 ml every 30 minutes, 49 aliquots, 6.5 liters composite sample volume.*
- *There is a 6-hour period of no production between day and night shift. Day shift ends at ~2:30 PM and night shift starts about 8:30 PM. There should only be 4.8 liters of sample. There is a high likelihood that the sampler is pulling clean water being discharged during off hours. The solution is to go with flow-proportional sampling.*

**Midmark Corporation**  
**Plant B - Powder Paint Line Washer Process/Flow Schematic Diagram**  
 Rev. 1-2-09

