

**Environmental
Protection Agency**

Tim Brownlee, Governor
Lee Fisher, Lt. Governor
Chris Jones, Director

June 29, 2010

RE: Pretreatment Compliance Inspection and
Notice of Violation

Mr. Jerry McEldowney
Midmark Corporation
PO Box 286
Versailles, OH 45380

Dear Mr. McEldowney:

On June 16, 2010 I met with you to conduct a wastewater pretreatment inspection. A review of your self-monitoring reports from January through December 2009 revealed no reported violations of the limits in your Indirect Discharge Permit. During our meeting I pointed out that your Discharge Monitoring Report (DMR) for the period of July through December 2009 was missing monitoring results for the two-month period of July through August 2009. You have since amended the report to include the missing data collected on August 25th.

Operations associated with the paint preparation line have not changed. I did point out that some of the flexible ducts on the air knife drier at the end of the paint prep line were broken or missing which was leading to rinse water drag out causing puddles on the floor. I also noted that part racking on the conveyor line did not appear to consider the impact part orientation had on drag out. Significant amounts of liquid can be carried from stage to stage which can significantly affect the effectiveness of each stage (inconsistent finish quality) and necessitate more frequent chemical make-ups and tank dumps. Racking is a very important aspect of manufacturing process and I encourage you to investigate whether there is an opportunity to improve racking techniques at Midmark.

Finally, your composite sampling method continues to be inconsistent with the requirement of your discharge permit. Sampling records prepared by your contract laboratory reveal that time-proportional sampling is being back-calculated to indicate an equivalent flow-proportional sampler pacing. As we discussed, documentation of flow-proportional sampling typically shows programmed pacing such as 200 milliliters collected every 200 gallons discharged whereas your records show very odd aliquot volumes and flow amounts indicative of a back-calculation.

Mr. Jerry McEldowney
June 29, 2010
Page 2

This issue was raised during my previous inspection and it is necessary to resolve this deficiency as soon as possible. Discuss this issue with your contract lab and make sure all future monitoring integrates your flow meter with their automatic composite sampler. Please inform me how the sampler is to be programmed for future sampling events.

It would be ideal for you to observe the set up and programming of the sampler at the next sampling event to ensure this matter has been addressed. Also, you may want to consider obtaining your own automatic composite sampler.

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



Environmental
Protection Agency

PRETREATMENT INSPECTION REPORT

Southwest District Office

PERMIT NUMBER
1DP00047*CP

FACILITY NUMBER
OHP000201

DATE CONDUCTED
June 16, 2010

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1115

TIME OUT
1245

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**

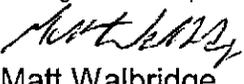
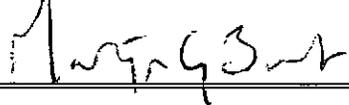
CONTACT (NAME/TITLE/PHONE/e-MAIL)

Jerry McEldowney / EH&S Coordinator / (937) 526-8498 / jmceldowney@midmark.com

FACILITY EVALUATION (See Inspection letter for more complete description)

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

U	Sampling Procedures	NA	Compliance schedule requirements
M	Reporting	NA	Notification
S	Compliance with effluent limits		Other -

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

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Midmark Corporation - Plant B**

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

OH Number: **OHP000201**

IDP Number: **1DP00047*CP**

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?
If no, explain: Y / N

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: **Still not conducting flow-proportional sampling.**

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

Conduct flow-proportional sampling.

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?
If yes, explain: Y / N

Production volume has regained the ~20% it had declined.

Compressors and vacuum production came in from their New York facility in July '09.

10. General facility description and operations:

**Manufacture medical exam tables, dental chairs, veterinary vacuums, 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?
If yes, explain: Y/N
12. Any expansion or production increase expected within the next year?
If yes, explain: Y/N

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?

Jerry McEldowney 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 and may request to discharge one or both to the sanitary sewer.

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	sample at final collection	-3,035 gpd to sewer with -10,300 gallons dumped to sewer quarterly	-5,000		
Noncontact Cooling		-	-		(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.
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*) 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.

Siaprene Adhesive containing: Toluene

Laminate Contact Adhesive containing: 1,1,1 Trichloroethane

Looking into non-TTO alternatives

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

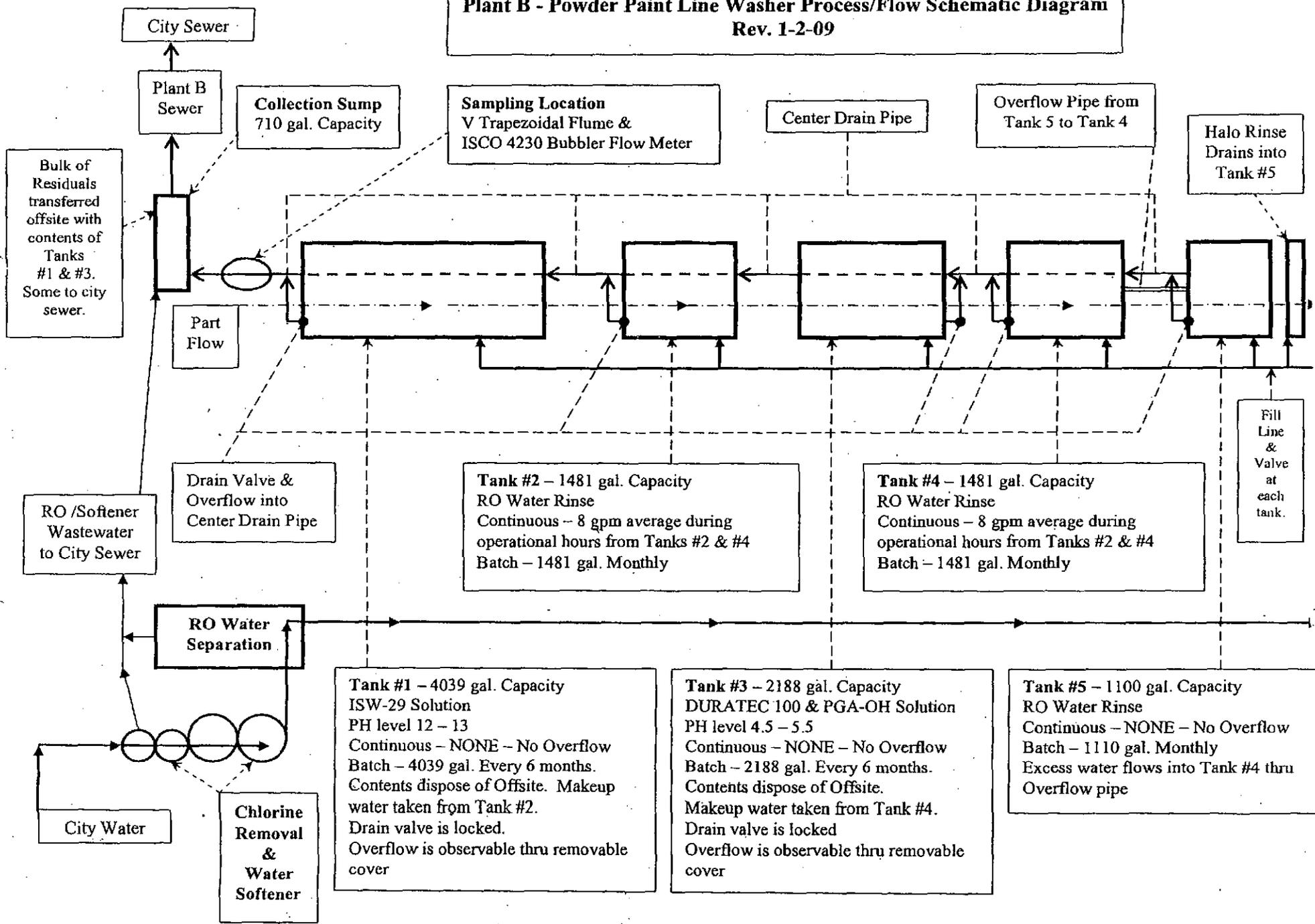
REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

GENERAL OBSERVATIONS

- ***Chain of custody sheets need to include when sampling events start and stop and the sample volume.***
- ***Auto-sampler is currently programmed to collect time-proportional samples instead of the required flow-proportional samples.***

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



City Sewer

Plant B Sewer

Collection Sump
710 gal. Capacity

Sampling Location
V Trapezoidal Flume &
ISCO 4230 Bubbler Flow Meter

Center Drain Pipe

Overflow Pipe from
Tank 5 to Tank 4

Halo Rinse
Drains into
Tank #5

Bulk of Residuals
transferred
offsite with
contents of
Tanks
#1 & #3.
Some to city
sewer.

Part
Flow

Drain Valve &
Overflow into
Center Drain Pipe

RO /Softener
Wastewater
to City Sewer

Tank #2 – 1481 gal. Capacity
RO Water Rinse
Continuous – 8 gpm average during
operational hours from Tanks #2 & #4
Batch – 1481 gal. Monthly

Tank #4 – 1481 gal. Capacity
RO Water Rinse
Continuous – 8 gpm average during
operational hours from Tanks #2 & #4
Batch – 1481 gal. Monthly

Fill
Line &
Valve
at each
tank.

RO Water
Separation

Tank #1 – 4039 gal. Capacity
ISW-29 Solution
PH level 12 – 13
Continuous – NONE – No Overflow
Batch – 4039 gal. Every 6 months.
Contents dispose of Offsite. Makeup
water taken from Tank #2.
Drain valve is locked.
Overflow is observable thru removable
cover

Tank #3 – 2188 gal. Capacity
DURATEC 100 & PGA-OH Solution
PH level 4.5 – 5.5
Continuous – NONE – No Overflow
Batch – 2188 gal. Every 6 months.
Contents dispose of Offsite.
Makeup water taken from Tank #4.
Drain valve is locked
Overflow is observable thru removable
cover

Tank #5 – 1100 gal. Capacity
RO Water Rinse
Continuous – NONE – No Overflow
Batch – 1110 gal. Monthly
Excess water flows into Tank #4 thru
Overflow pipe

City Water

Chlorine
Removal
&
Water
Softener