



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402

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www.epa.state.oh.us

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

July 26, 2007

RE: Production Paint Finishers, Inc.
Pretreatment Compliance Inspection and
Notice of Violation

Mr. Allen Francis
Production Paint Finishers, Inc.
P.O. Box 127
Bradford, OH 45308

Dear Mr. Francis:

On June 14, 2007 I met with you to conduct a pretreatment inspection of your facility. No new processes have been added but you indicated that employment is up significantly from the time of my previous inspection. A fairly large building expansion to provide new office and break room space is expected to be completed at the end of 2007. You said that this could open up existing areas for increased production although no new production equipment is anticipated to be brought in.

Reporting Violations

A review of your self-monitoring reports since my previous inspection revealed that you failed to report pH monitoring results during the six-month reporting periods of June through November 2006 and December 2006 through May 2007 at both of your facility's two regulated discharges. You indicated that you recall monitoring pH but that you have not been able to locate any record of the results. To remedy this situation, I suggest that you record pH measurements (date, time and the person to take the reading) on the chain of custody sheets sent with the sample to the laboratory. Since pH is to be measured from a grab sample, it can be measured when the last aliquot and recorded on the chain of custody sheet when the composite sample is prepared for delivery to your contracted analytical laboratory. It is necessary for you to explain how you plan to ensure that pH measurements will be monitored and reported properly in the future.

Other Reporting Documentation

Please note that it is necessary for you to use the alternate 'AH' reporting code on the self-monitoring report when you submit the certification statement in lieu of monitoring for Total Toxic Organics (TTOs). Also, I ask that you maintain a log record of who collects each aliquot and when the aliquots are collected.

Verification of Discharge Flow

During the inspection I expressed an interest in verifying the estimated discharge flows (especially through outfall 001) that you report and inquired about water billing records as a means for cross-checking the flows. You were able to produce monthly water bill readings for the period of January through June 2007 that indicated a monthly usage of approximately 650,000 gallons. This translates to an average work day flow of approximately 32,500 gallons which is far greater than the approximately 5,000 gpd that you report as an estimated flow even when considering sanitary water usage from 200 employees (~20 gpd/employee). You speculated that evaporative losses could be the reason for the difference in flows.

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To resolve this issue, I am very interested in having you provide a measurement of your discharge based on the use of a flow meter installed in the discharge line as a verification of the flow meters installed on the feed water lines to the process tanks. I ask that you please contact an environmental consultant or your analytical laboratory that collects samples to find out what it would take to provide a temporary measuring device during one of your normal sampling events. The main water meter should be read during this event. A multi-day flow monitoring event (exclusive of sampling) would be ideal. Please let me know if you plan to conduct the proposed flow verification.

Indirect Discharge Permit Renewal

Your Indirect Discharge Permit (IDP) is in the process of being renewed. It is anticipated that the limits will change for outfall 001 to reflect updated values for process and dilution flows and that the self-monitoring report due dates and the periods covered by the reports will change.

There is also an opportunity to possibly avoid self-monitoring requirements for pollutants determined not to be present in your facility's discharge. From a practical standpoint, this means cyanide since metals are otherwise easily and cheaply analyzed from one sample. Since you don't have any active treatment, it is not necessary to include the required sampling of the process wastewater prior to any treatment. However, you will still need to show that a pollutant is not present in your discharge through non-detectable sample results using approved analytical methods with the lowest method detection limit for that pollutant as found in 40 CFR, Part 136.

The request for a monitoring waiver is required to be signed in accordance with paragraph (F) of rule 3745-3-06 of the Ohio Administrative Code (you are authorized) and include the following certification statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you want to pursue this, you will need to submit a written request as soon as possible so that we can consider it as part of the permit renewal we are preparing.

Please provide a written response by August 17, 2007 that addresses the issues I've presented in this letter. If you have any questions about this letter, the inspection form or updated process flow diagram, please contact me at (937) 285-6095.

Sincerely



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURE

CC: Julia Zhang, PE – Ohio EPA / Central Office / DSW
Rodger Looker – Village of Bradford



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER
1DP00021*CP

POTW FACILITY NUMBER
OH0020192

DATE CONDUCTED
June 14, 2007

INSPECTION TYPE
1

INSPECTOR
S

FACILITY TYPE
2

TIME IN
0955

TIME OUT
1320

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**Production Paint Finishers, Inc.
140 Center Street
Bradford, OH 45308**

POTW RECEIVING DISCHARGE

Village of Bradford WWTP

MAILING ADDRESS OF FACILITY

**Production Paint Finishers, Inc.
P.O. Box 127
Bradford, OH 45308**

CONTACT (NAME/TITLE/PHONE)

Mr. Allen Francis / Vice President and General Manager / (937) 448-2627

FACILITY EVALUATION (See Inspection letter for more complete description)

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

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

Name and Signature of Inspector(s)

Matt Walbridge
Matt Walbridge

Agency / Office / Telephone

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

Date

7-26-07

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Production Paint Finishers, Inc.**

Date of inspection: **June 14, 2007**

POTW's OH Number: **OH0020192**

IDP Number: **1DP00021*CP**

Facility Representative: **Mr. Allen Francis**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **June 16, 2006**

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:

4. Was the facility required to perform any actions as a result of the last inspection?
Explain any unresolved actions: **None**

Y / ~~N~~

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~100 full time**
~100 part time

6. Shifts/Day: **3 on the Main Line, 3 on Booth 6 (dry)**

7. Production Days/Year: **~250 (5 days per week)**

8. Hours/shift: **8 (plus some overtime)**

9. Any production changes since the last inspection?
If yes, explain:

Y / ~~N~~

Business is up from previous inspection – there is about a 50% increase in washing operations.

The volume of metal parts processed has increased about 25% with about a 50/50 mix of aluminum and steel parts being painted.

10. General facility description and operations:

Job shop metal finishing including parts washing, iron phosphating (including manual spray), sealing, painting. Ancillary operations include rack cleaning, acid pickling and sand blasting.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N

If yes, explain:

(Materials continue to be aluminum, steel, cast iron and a very, very small amount of zinc galvanized parts.)

12. Any expansion or production increase expected within the next year? Y/N

If yes, explain:

A new office break room expansion (fairly significant building expansion) is expected to be completed at the end of 2007. This could open up old areas for increased production although no new equipment is anticipated to be brought in.

WASTEWATER TREATMENT

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

Treatment consists of a concrete tank (like a septic tank) buried underground outside the building. There is a tank for each outfall.

A centrifuge on the wet paint spray booth separates paint solids and returns the water to the paint booth water reservoir.

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~~ discharge mode of operation? Batch / Continuous / Combination

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?
overseeing the process line discharges

Production line managers (Doug Miller – 1st, Zak Hollenworth – 2nd and John Mensching – 3rd)

18. How often is the treatment system checked? N.A.

Allen Francis collects them during 1st and 2nd shifts, Jeff Baker (plant manager) collects sample aliquots during 2nd and 3rd shifts.

WASTEWATER TREATMENT CONTINUED

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

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

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

Method of disposal:

- *Paint booth solids are collected in bags inside a drum under the centrifuge (the centrifuge works much better than the old one).*
- *~1,000 lbs of sludge from washers is pumped out every year.*
- *The underground settling tanks are pumped out three times per year (January, May and September),*

Frequency and amount of disposal:

Approximately 2 bags (@ 70 lbs per bag) generated per shift from the paint centrifuge. Every couple of days after paint is dry it gets dumped to the solid waste dumpster.

The underground settling tanks accumulate approximately 6 to 8 inches of sludge between cleanings.

Name of hauler/landfill/disposal facility:

Rumpke takes the paint sludge from the centrifuge.

ETSS of Ohio in Tipp City pumps out the underground settling tanks.

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

Mr. Francis continues to state that all sludges generated are non-hazardous

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. Acid Pickle Rinse	002		ND	NA	NA
2. Iron Phosphate and Rinse	002		ND	NA	NA
3. Alkaline Cleaning	-	-	No discharge	NA	NA
4. Alkaline Cleaning Rinse	-	-	discharged to stage 1 as make-up.	NA	NA
5. Iron Phosphate Rinse	001	-	-1,920 ⁽¹⁾	NA	NA
6. Non-chrome Sealing	-	-	No discharge	NA	NA
7. Paint Booth Overflow ⁽³⁾	-	-	0 (Hauled off-site)	NA	NA
Total Regulated Process Flow	002 / 001	- / 4,521	-300 / -1,920	(1) 2 gpm @ 16 hrs/day (2) Reported flows at outfall 001 have always been 3,000 gpd. (3) Any overflow would go onto the floor where there are no drains. (4) Not present at sampling point.	
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis Reject	002 / 001	- / 1,010	- / ~1,000		
Demineralizer Regeneration					
Softener Backwash					
Filter Backwash					
Compressor Condensate (2 new, 4 total)	002 / 001		-50 / -		
Storm water					
Total of Dilute Flows	002 / 001	- / 1,010	-50 / -1,000		
Unregulated Flows					
Sanitary			~ 800 ⁽⁴⁾		
TOTAL FLOW	002 / 001	- / 5,531	-300 / 2,900 ⁽²⁾		

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:
- 001 - "Samples shall be collected at the effluent from the sampling pit in front of the facility near the corner of Harrison Street and Center Street."**
- 002 - "Samples shall be collected at the effluent from the 1,500 gallon holding tank for the high pressure powersprayer wastewater when the powersprayer is in use."**
27. Is the facility sampling at the location(s) described in the permit? Y / N
 If no, describe the actual location:
- (Sampling is from the cleanouts located immediately downstream from the underground tanks.)**
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? *N.A.*
- If estimated, describe method of estimation: **Based on water usage in Stage 4 (should be 5,760 gpd).**
- (Water bills indicate that PPF uses substantial amount of water with the difference having to be evaporative losses – this needs to be investigated)**
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:
- Allen Francis and Jeff Baker collect the samples. One sample is collected from station 001 when a tank dump occurs. On non-dump days, aliquots are collected into a composite jug (three on 1st shift, three on 2nd shift) using a hand syphon pump. The contents of the composite jug are then poured into the sample jars. The initials of the collector and the time of collection are recorded on a log sheet. Third shift operations are dry so there is no discharge to sample.**
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 | (See number 31 above) | Y / N |
| Proper preservation techniques | (Pre-preserved sample bottles) | Y / N |
| Sample holding times | | Y / N |
| Chain-of-custody forms | (Belmont uses them) | 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:
Toluene,
Acetone (the primary cleaning agent), toluene, ethyl benzene, naphthalene are common ingredients in paints and thinners. Xylene, MEK, MAK and MIBK are ingredients in paints. Methyl acetate is used to clean the paint guns and to thin paint.
36. Does the facility have a current toxic organic management plan (TOMP)? Y / N
TOMP acceptance is good until 4-30-07 when the permit expires.
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:

Valve handles on concentrate tanks on production line are removed.
Paint booth reservoir is plugged.

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

OBSERVATIONS

The contents of the paint booth and wash tank are pumped out and hauled off-site once a year.

Water usage (from bills) is significantly higher (~32,500 gpd) than reported discharge flows (5,000 gpd). The only explanation that was offered at the time was evaporative losses. This needs to be investigated.

Production Paint Finisher, Inc. Process Flow Diagram for Outfall 001

July 2007

