



State of Ohio Environmental Protection Agency

Southwest District Office

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

September 4, 2008

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 August 27, 2008 I met with you to conduct a pretreatment inspection of your facility. I greatly appreciate that you accommodated me on very short notice. A review of your discharge monitoring reports since the previous inspection revealed no reported violations of your indirect discharge permit; your facility's compliance is also greatly appreciated.

Your building expansion is complete which has provided you much needed space. You indicated that the expansion has not resulted in increased wastewater production. During the inspection I noted that sampling is done by collecting samples throughout the day using a hand siphon that you indicated was used to pump wastewater into the composite sample jug. You showed me the log sheets you use to record the collection of these aliquots (individual samples that make up a larger sample) and I found them to be a good record of how and when sampling is conducted. I suggest that you consider using a graduated beaker so that equal amounts are collected throughout the day. This would avoid having aliquots that would skew the final sample to disproportionately represent times when those unequal aliquots were collected. This presumes that your facility's discharge rate is uniform throughout the day. It is necessary for you to notify me if flow rates vary significantly throughout the day so that we can discuss the need for an alternate sample collection method.

As was discussed in my previous inspection letter, I continue to be interested in finding out what your facility's actual daily discharge volume is relative to daily water consumption. I ask that you discuss this with your consultant to see if they have any ideas on how to obtain a fair measure of your discharge so that evaporative losses can be better quantified. Please let me know what their thoughts are on this issue.

Finally, I noted that you are receiving analytical results from Belmont Laboratories, transcribing them onto a reporting form, sending them to August Mack for the results to be entered into Ohio EPA's e-DMR system. I encourage you to try to streamline this data management by either having Belmont submit results to both you and August Mack or even authorizing Belmont to enter the results in e-DMR directly. You may also want to see if Belmont can provide the analytical results in an Excel format which would allow for a direct population of the e-DMR form. All of these ideas are intended to minimize the potential for transcription errors.

Please provide a written response by September 22, 2008 that addresses the issues I've presented in this letter. If you have any questions about this letter or the inspection form or process flow diagram, please contact me at (937) 285-6095.

Sincerely

Matt Walbridge
Division of Surface Water

CC: Julia Zhang - Ohio EPA / Central Office / DSW
Rodger Looker - Village of Bradford



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

PERMIT NUMBER
1DP00021*DP

APPLICATION NUMBER
OHP000124

DATE CONDUCTED
August 27, 2008

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
0945

TIME OUT
1145

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)

S	Sampling Procedures	NA	Compliance schedule requirements
S	Reporting	S	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

9-4-08

Signature of Reviewer

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

Date

9/5/08

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Production Paint Finishers, Inc.*

Date of inspection: *August 27, 2008*

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 14, 2007*

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?
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:

Still don't know exactly what the daily discharge flow after taking into account evaporation losses.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *~150 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? Y/N
If yes, explain:

Business continues to expand although parts washing operations are about the same.

The rust inhibitor dip that used to discharge through outfall 002 has been removed.

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, sand blasting and a very small amount of acid pickling.

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 very small amounts of zinc galvanized parts.)

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

If yes, explain:

The expansion was completed as planned. New sandblasting room exists in the new building used for seam/joint caulking. Existing areas were opened up and parts handling is much less congested. None of the expansion impacted wastewater.

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. There is no discharge from this operation.

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.*
- *~1,000 lbs of sludge from the parts washer 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 when they clean out the first and third stages of the parts washer.

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 <i>(hardly used, likely to be removed soon)</i>	002	-	Very low	NA	NA
2. Iron Phosphate and Rinse	002	-	~300	NA	NA
3. Alkaline Cleaning	-	-	Hauled off-site	NA	NA
4. Alkaline Cleaning Rinse	-	-	Discharged to stage 1 as make-up.	NA	NA
5. Iron Phosphate	-	-	Hauled off-site		
6. Iron Phosphate Rinse	001	-	~5,760 ⁽¹⁾	NA	NA
7. Non-chrome Sealing	001	-	1,480 gallons Every 3 months	NA	NA
8. RO Mist Rinse	-	-	4 gpm discharged to Phosphate rinse	NA	NA
9. Paint Booth Overflow ⁽³⁾	-	-	Hauled off-site	NA	NA
Total Regulated Process Flow	002 / 001	- 5,760	300 / 7,500	(1) 4 gpm @ 24 hrs/day (2) Reported flows at outfall 001 are 7,500 gpd and 300 for outfall 002. (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	- / 1,740	- / ND		
Demineralizer Regeneration					
Softener Backwash					
Filter Backwash					
Compressor Condensate (4 compressors)	002 / 001		~50 / -		
Storm water					
Total of Dilute Flows	002 / 001	300 / 1,740	~300 / ~7,500		
Unregulated Flows					
Sanitary			~ 800 ⁽⁴⁾		
TOTAL FLOW	002 / 001	300 / 1,740	~300 / ~7,500 ⁽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 power sprayer wastewater when the power sprayer 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
(Would be nice to measure the actual discharge flow to verify the estimates and account for evaporative losses)
- 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 and 3 on 3rd shift) using a hand siphon 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.**
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 | <i>(See number 31 above)</i> | Y / N |
| Proper preservation techniques | <i>(Pre-preserved sample bottles)</i> | Y / N |
| Sample holding times | | Y / N |
| Chain-of-custody forms | <i>(Belmont uses them)</i> | 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 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 paint booth water reservoir and the alkaline wash tank are pumped out and hauled off-site about twice a year.

It would be nice to measure the actual discharge to verify the flow estimates and account for evaporative losses.

PRODUCTION PARTS FINISHER, INC.
Process Flow Diagram for Outfall 001

July 2007
 August 2008



