



State of Ohio Environmental Protection Agency  
Southwest District

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Dayton, Ohio 45402-2911

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

September 24, 2007

Ms. Ann Pence  
Greenfield Products, Inc.  
P.O. Box 99  
Greenfield, Ohio 45123

**Re: Greenfield Products, Inc. -- Greenfield -- Annual Inspection -- 2007**  
**NOTICE OF VIOLATION**

Dear Ms. Pence:

On August 24, 2007, I conducted the annual pretreatment inspection at your facility. The facility was represented by Missy Reed. The facility is considered to be a significant industrial user (SIU) because it is regulated under the Metal Finishing Categorical Standard, 40 CFR 433.17. The inspection covered the PVC coating area, the shipping and storage areas, the iron phosphating and powder coat area, the zinc phosphating and e-coat area, the pretreatment system, and sampling location.

During the past year, the facility had one permit violation. The violation is:

Station No. 1DP00036001

Parameter	Code	Date	Reported	Units	Permit Limit
Zinc, Total	01092	02/06/07	2,850	ug/L	2,610 ug/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. Additional sampling showed the facility has returned to compliance. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Greenfield Products, Inc. (GPI) does job shop and custom coatings. The facility provides



parts washing followed by coating with powder coat, e-coat or PVC. The facility coats anchors, appliance parts, natural gas lines, and automotive parts. The parts are brought into the facility finished. These parts are then washed and prepared for coating. Once they are coated, the parts are then cured. They are packaged for shipment off-site. GPI may drill holes in some parts, but that is the only machining that is done on-site. The customer has the option of iron or zinc phosphating for surface preparation in addition to the coating choices.

#### Regulated Flows and Pretreatment

GPI has regulated process flows from the zinc and iron phosphating lines. The e-coat tank may also be dumped to the treatment system on an as-needed basis. Each of the lines has its own pretreatment system. The iron phosphate line has three overflowing rinses and periodic dumps of the concentrated tanks. All of the discharges are collected in a holding tank. The pH is checked, and if it is in compliance, the tank is discharged to the sanitary sewer. In past reports, the zinc phosphating line had three continuously overflowing rinses to a second holding tank. Water conservation measures were employed. Now the rinses are set up to counter flow so only one rinse is discharging. Because of this, the flow rates have dropped from 6 gpm to 2 gpm. There are also periodic dumps from the concentrate tanks. If the e-coat tank must be disposed of, it would also be treated in the pretreatment system for the zinc line. The pretreatment system for the zinc line includes metals removal and pH adjustment. The discharge from this system is also collected and checked prior to discharge to ensure that it is in compliance. Solids are then dewatered in a sludge thickening tank and a plate-and-frame filter press. The sludge has been tested and determined to be non-hazardous. The zinc pretreatment system is still discharging approximately once a week. The sludge is still being taken by Waste Management.

#### Storage Areas

The storage areas haven't changed since the 2000 inspection (report dated August 18, 2000).

#### Sampling

GPI is using Ginosko Labs for its contract laboratory.

#### Storm Water

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

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The assistance provided by your staff was appreciated. Should you have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marianne Piekutowski', with a long horizontal flourish extending to the right.

Marianne Piekutowski  
District Pretreatment Coordinator  
Division of Surface Water

Enclosures

Cc: Missy Reed, GPI  
Beryl Cooper, Greenfield  
Julia Zhang, DSW/CO



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
1DP00036*BP	OHP000067	08/24/2007	I	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Greenfield Products 1230 North Washington Street P.O. Box 99 Greenfield, Ohio 45123		9:00 am	10/01/2005
		Exit Time	Permit Expiration Date
		10:00 am	09/30/2010
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Missy Reed, Quality Manager		800.582.6287	
POTW Receiving Discharge		Categorical Standard(s) or Other Classification	
City of Greenfield WWTP		40 CFR 433.17	

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)			

Inspector		Reviewer	
	9/24/07		9/24/07
Marianne Piekutowski Division of Surface Water Southwest District Office	Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	Date

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Greenfield Products**

Date of inspection: **August 24, 2007**

OH Number: **OHP000067**

IDP Number: **1DP00036\*BP**

Facility Representative: **Missy Reed**

Inspector(s): **Mari Piekutowski**

### COMPLIANCE

1. Date of last pretreatment inspection: **August 17, 2006**

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

**There was one daily zinc violation in February 2007. This inspection report will serve as the notice of violation.**

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:

### FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **50**

6. Shifts/Day: **1**

7. Production Days/Year: **260**

8. Hours/shift: **4 10 hours for Anchor; 5 8 hours for other**

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

**Powder coat is up from last year. E-coat is down to approximately 5 days per month. Sprayable PVC is still down. The dip PVC is also still running.**

10. General facility description and operations:

**The facility receives finished parts and coats them with PVC and powder coat. The facility also does custom coating and job shopping for coating. Parts include anchors, tent stakes, treadmill rollers, appliance products, and some automotive parts.**

**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:

*There is a possibility of adding a second shift to powder coat. The facility is working on trying to fill the capacity of both the powder and e-coat lines.*

**WASTEWATER TREATMENT**

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

*See attached schematic.*

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: Date:

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

If batch, list the frequency and duration:

*The zinc discharge is down from once or twice a week. The iron phosphate discharges are less than two batches per day. This is mainly from the powder coat. The flow rate is approximately 4,500 gpd during production.*

17. Who is responsible for operating the treatment system?

*The Lab Technician is responsible for the zinc phosphate treatment and the iron phosphate treatment.*

18. How often is the treatment system checked?

*Prior to the discharge of each batch.*

**WASTEWATER TREATMENT CONTINUED**

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

*There is no alarm on the system. However, the automatic valve was replaced with a manual double valve. Both valves have to be opened in order for the wastewater to be discharged.*

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

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

*pH electrode, 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:

*Waste Management takes the sludge for off-site disposal.*

Frequency and amount of disposal:

*Down from approximately 1,700 pounds per month.*

Name of hauler/landfill/disposal facility:

*The facility had a TCLP run of its sludge. It was determined to be non-hazardous. The sludge is now being taken by Waste Management for disposal. Crystal Clean takes the toluene, alcohol, etc. off-site for disposal.*

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

If land applying sludge, is there a sludge management plan? 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
E-coat and Zn phosphate Line (6 Stage)	<i>End-of-Process</i>		1,500		
Fe Phosphate line including Cleaners and rinses w/o Zinc	<i>End-of-Process</i>		4,500		
<b>Total Regulated Process Flow</b>			<b>6,000</b>		
Non-Contact Cooling			-		
Blowdown			-		
Reverse Osmosis			<i>Reject water To discharge.</i>		
Demineralizer Regeneration			<i>To pH adjust</i>		
Filter Backwash			-		
Compressor Condensate			-		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			-		
<b>TOTAL FLOW</b>			<b>6,000</b>		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).  
*Storm water flow is the only discharge not going to the Greenfield WWTP. This has received coverage under the general industrial stormwater permit.*

**SELF MONITORING**

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

***Discharge pipe of the wastewater collection tank.***

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?

***Read from the tank volume.***

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? Y /N  
Monitoring frequencies Y /N  
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y /N  
Flow proportioned samples ***Continuous pull when discharging.*** 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:

***Ginosko***

**TOXICS MANAGEMENT**

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

*Acetone, Toluene, Xylene, and Isobutyl Alcohol. These are being disposed of by Crystal Clean.*

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? Y / N

39. Identify any potential slug load or spill areas:

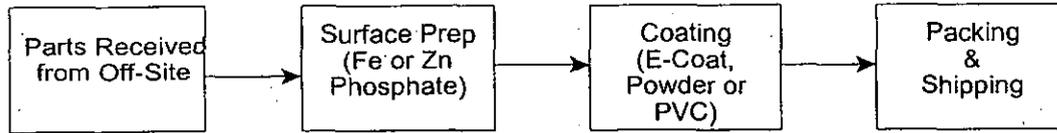
*None noted.*

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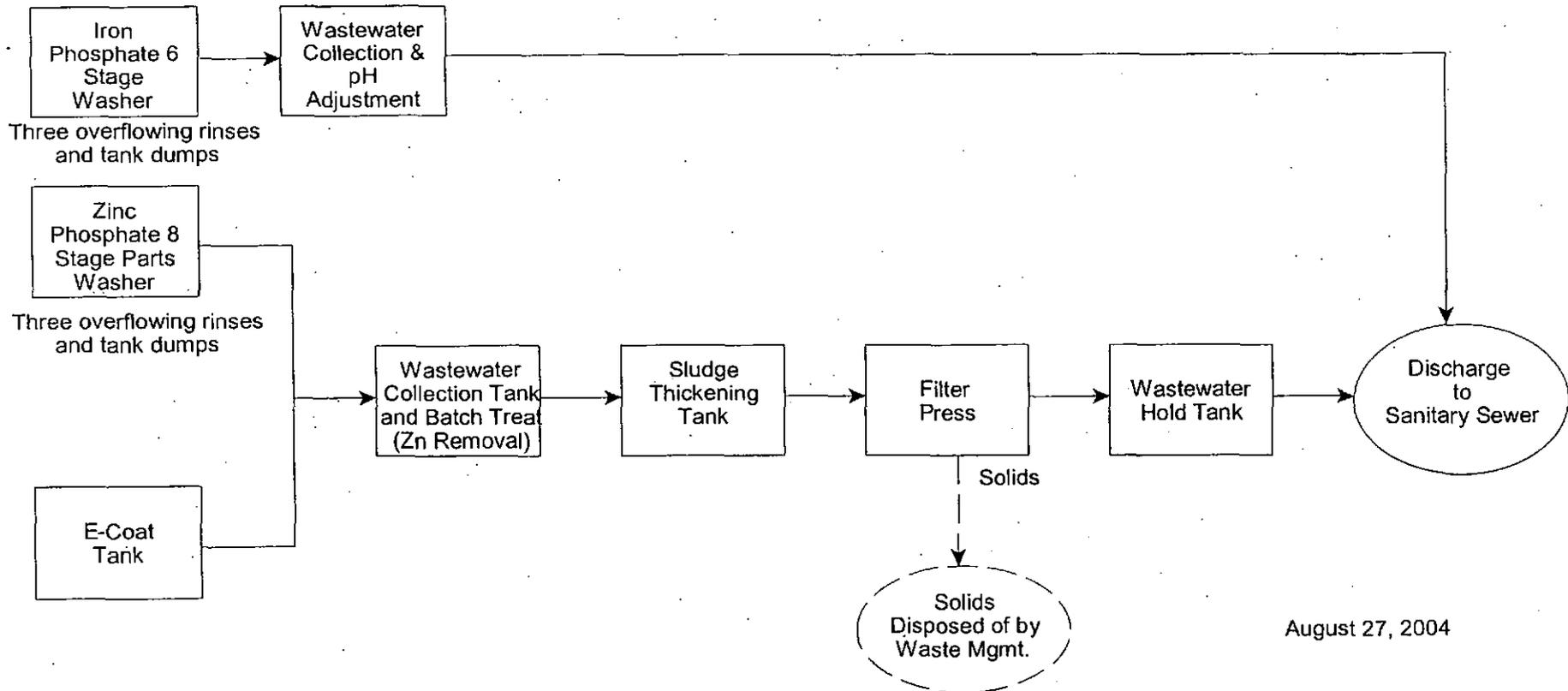
**REQUIRED FOLLOW-UP ACTIONS**

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# Greenfield Products Process Schematic



# Greenfield Products Treatment Schematic



August 27, 2004