



State of Ohio Environmental Protection Agency
Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.us

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

August 20, 2009

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

**Re: Greenfield Products, Inc. -- Greenfield -- Annual Inspection -- 2009
Notice of Violation & SNC Determination**

Dear Ms. Pence:

On August 13, 2009, I conducted the annual pretreatment inspection at your facility. The facility was represented by Steve McCoy. 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. This violation has already been addressed. Additional sampling showed the facility has returned to compliance. However, the facility has not submitted its self-monitoring reports for the second half of 2008 and the first half of 2009. Because of this, the facility will receive an overall rating of marginal.

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.

The facility is no longer doing the galvanized parts in the iron phosphate line. The cleaners were also investigated. Galaxy's chemicals will still be used. Since they are supplying all of the chemicals for the facility, Galaxy will now be doing the analytical work for the facility's self-monitoring report. Participation in USEPA's DMRQA program was also discussed as a tool for adequate QA for the contract laboratory.

GPI is in the process of finishing a water conservation project. The facility will be using a reverse osmosis (RO) unit for its water instead of a demineralizer. The RO reject water that is generated is being collected in a tank, and then used in the rinses of the washers. This saves on the use of City water. The facility used a smaller temporary tank they already had to see if the project would work. The facility will now be installing a larger permanent tank.

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. However, Galaxy, their chemical supplier will be performing the analytical work in the future. The facility's environmental representative left at the end of last year. As a result of the personnel transition, the self-monitoring reports for the second half of 2008 and the first half of 2009 were not submitted as required. The 24 hour notification of a violation for the February 2009 was done, but the 4519s were not submitted. The facility is in the process of submitting this data. This inspection report will serve as the Notice of Violation for the late reports. In addition, since

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the report for the second half of 2009 is more than 45 days late, the facility is significant non-compliance for late reporting. These reports must be submitted as soon as possible, but no later than September 4, 2009.

Storm Water

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

REQUIRED ACTION

Greenfield Products, Inc. must submit its self-monitoring reports for the second half of 2008 (due January 20, 2009) and the first half of 2009 (due July 20, 2009). These reports must be submitted by September 4, 2009.

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: Steve McCoy, Greenfield Products, Inc.
Jim McCoy, Greenfield
Ryan Laake, DSW/CO



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

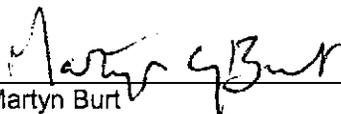
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00036*BP	OHP000067	08/13/2009	I	S	2

Section B: Facility Data			
Name and Location of Facility Inspected Greenfield Products 1230 North Washington Street P.O. Box 99 Greenfield, Ohio 45123		Entry Time	Permit Effective Date
		Exit Time	Permit Expiration Date
		10:00 am	10/01/2005
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Steve McCoy, Director of Operations		937.981.2696	
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)			
M	Pretreatment		

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 8/20/09	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 8/21/09

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Greenfield Products**

Date of inspection: **August 13, 2009**

OH Number: **OHP000067**

IDP Number: **1DP00036*BP**

Facility Representative: **Steve McCoy**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **August 20, 2008**

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 2009. A Notice of Violation was already sent for his event on May 15, 2009. The self-monitoring reports for the second half of 2008 and first half of 2009 must be submitted. Due to personnel changes, these have not yet been submitted.

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:

The facility needs to submit its self-monitoring for the second half of 2008 and the first half of 2009.

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

The galvanized parts that were causing the elevated zinc levels are no longer being processed at the facility. The sampling of the cleaner to determine tank dumping also helped. The facility is sticking with Galaxy for its chemicals.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **40**

6. Shifts/Day: **1**

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

8. Hours/shift: **4 10 hours**

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

Powder coat is up from last year. E-coat is about the same as last year. Sprayable PVC is no longer being done. The dip PVC is also still running, but is down about 30%. This is tied to anchor production being down. There was no PVC running on the day of the inspection.

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:

The facility is using Galaxy cleaners for the iron phosphate line. These chemicals ended up not changing. The facility is also switching to RO water instead of DI water. The RO reject will be captured and used in the rinse tanks instead of City water.

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

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 twice a month. The iron phosphate discharges are less than two batches per day. This is mainly from the powder coat. The flow rate is approximately 5,500 gpd during production.

17. Who is responsible for operating the treatment system?

The Lab Technician (Gary Rhoads) 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 paper, pumps. The facility can get another pH probe within the day.

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:

Approximately 900 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>		6,000		
Total Regulated Process Flow			7,500		
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			-		
TOTAL FLOW			7,500		

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?

Every batch is checked prior to discharge. The meter is calibrated daily.

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, but will be switching to Galaxy.

TOXICS MANAGEMENT

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

MEK, 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

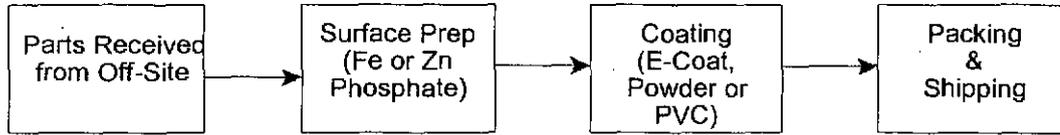
39. Identify any potential slug load or spill areas:

None noted.

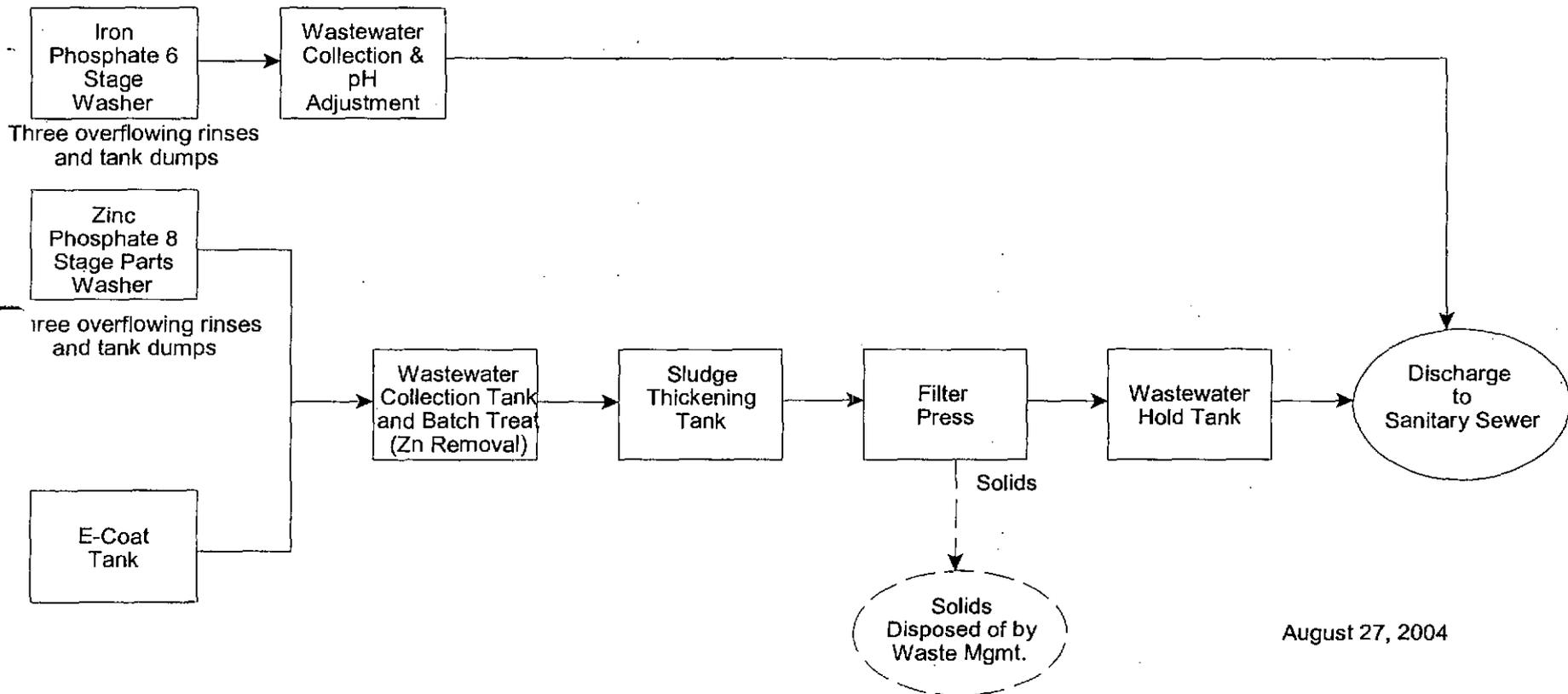
REQUIRED FOLLOW-UP ACTIONS

Greenfield Products must submit their self-monitoring reports for the second half of 2008 and the first half of 2009.

Greenfield Products Process Schematic



Greenfield Products Treatment Schematic



August 27, 2004