



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 9, 2011

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

**Re: Greenfield Products, Inc. -- Greenfield -- Annual Inspection -- 2011
Notice of Violation**

Dear Ms. Pence:

On July 27, 2011, I conducted the annual pretreatment inspection at your facility. The facility was represented by Steve McCoy and Gary Rhoads. 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.

The facility is submitting its self-monitoring data as required. There were no sampling violations since the last inspection. However, the facility has not yet submitted the renewal application for its indirect discharge permit. The facility's current permit expired on September 30, 2010. 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. 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 zinc phosphating line has three rinses that 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. On the day of the inspection, the counter-current rinses were not operational because a pump had just been replaced. All of the flow was going to the treatment system. 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 iron phosphate line is also being treated through the zinc pretreatment system. This line runs galvanized metal so zinc levels are high. The sludge is still being taken by Waste Management. At the current time, GPI has decided to keep its e-coat line, and will not be adding a second powder coat line. The facility is also considered increasing the treatment capacity of its pretreatment system. A permit to install (PTI) would be required at that time. This was discussed during the inspection, and the information needed for the PTI was provided under a separate email.

GPI is 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 currently uses a 300 gallon tank, but will install a larger permanent tank.

GPI's permit expired on September 30, 2010. The facility must submit its renewal application. This inspection will serve as the notice of violation for this.

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. The sampling reports were submitted as required. There were no violations.

Storm Water

The facility has received coverage under the expired general industrial storm water permit. GPI will be reapplying when the permit is renewed. In addition, there may be moving of storage areas. The stormwater pollution prevention plan (SWP3) would need to be updated to reflect any of these changes.

August 9, 2011

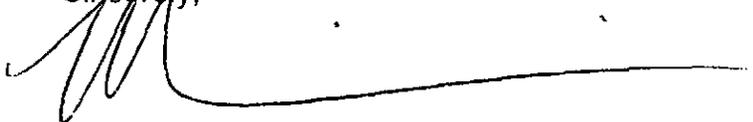
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REQUIRED ACTION

Greenfield Products, Inc. must submit renewal application for its indirect discharge permit by September 2, 2011. Failure to submit the renewal application in a timely manner is a violation of Ohio Revised Code 6111 and Ohio Administrative Code 3745-36(G)(1).

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

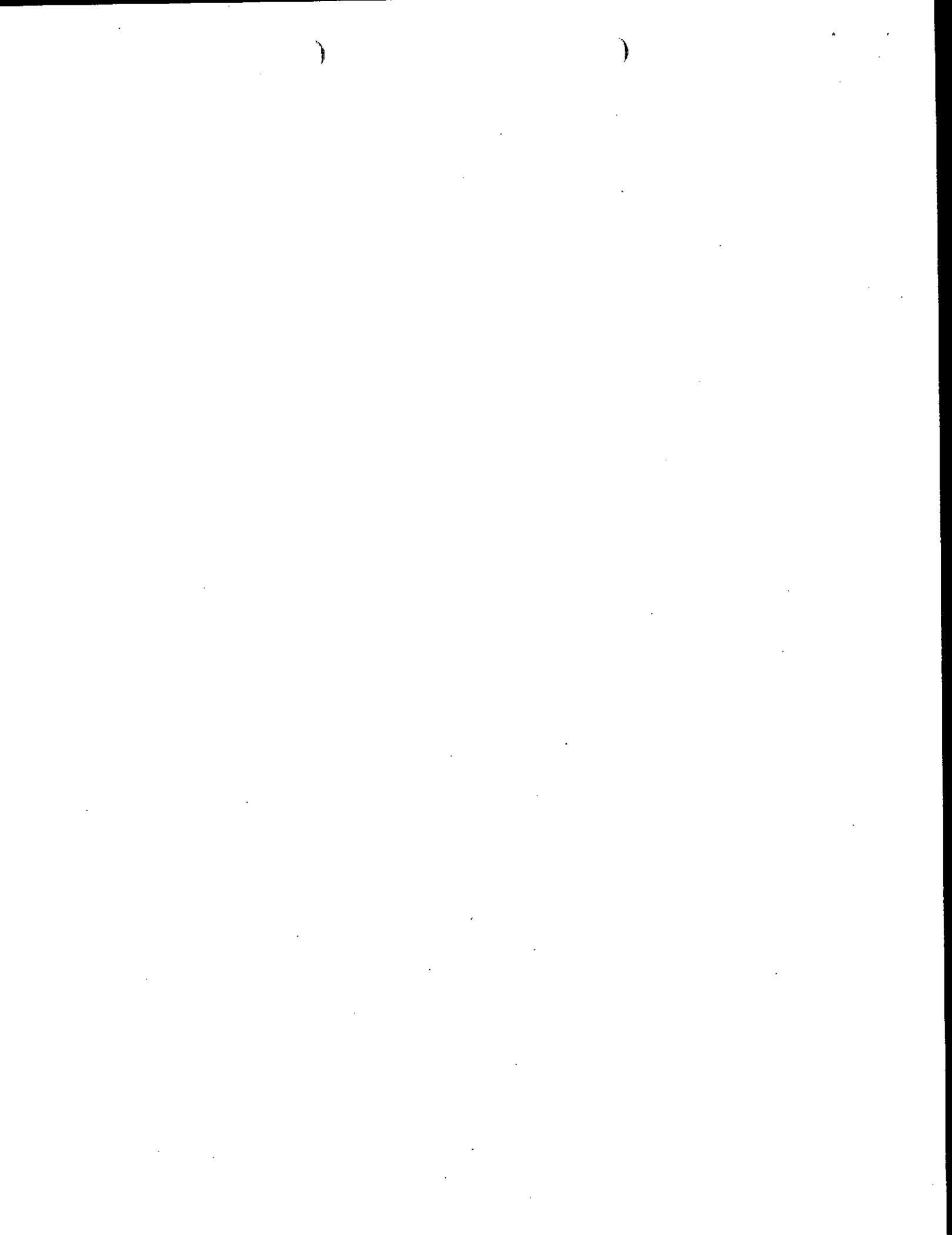
Sincerely,



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

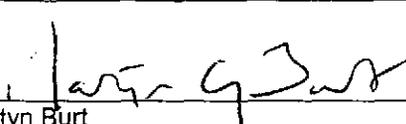
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00036*BP	OHP000067	07/27/2011	I	S	2

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	10:00 am	10/01/2005
	Exit Time	Permit Expiration Date
	12:10 pm	09/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Steve McCoy, Director of Operations Gary Rhoads	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	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
8/9/11 Date	8/9/11 Date

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Greenfield Products**

Date of inspection: **July 27, 2011**

OH Number: **OHP000067**

IDP Number: **1DP00036*BP**

Facility Representative: **Steve McCoy, Gary Rhoads**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **August 11, 2010**
2. Has the facility been in compliance with its permit limits since the last inspection? Y / ~~N~~
If no, explain:

The facility submitted its reports as required. They have been in compliance with the permit limits. The indirect discharge renewal application was not submitted. This must be done as soon as possible.

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:

The facility still needs to submit its renewal application for its indirect discharge permit.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **53**
6. Shifts/Day: **1**
7. Production Days/Year: **260**
8. Hours/shift: **4 10 hours Friday work is increasing.**
9. Any production changes since the last inspection? Y / ~~N~~
If yes, explain:

Powder coat is up 15-20% from last year. E-coat is about the same as last year. The dip PVC is also still running, but is flat. This is tied to anchor production being down. The PVC was 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, 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. The facility is also switched to RO water instead of DI water. The RO reject is being captured and used in the rinse tanks instead of City water. Currently, this is 300 gallons. The facility is looking at putting in a bigger tank to hold more reject water.

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

An increase in production is expected.

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 three times a month. The iron phosphate discharges are three batches per day. This is mainly from the powder coat. The flow rate is approximately 5,500 gpd during production. All of the process water is being treated through the zinc treatment system.

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			-		300 gallons of the RO reject is reused in the rinse tanks. Looking to increase this volume.
Blowdown			-		
Reverse Osmosis			<i>Reject water To recycle.</i>		
Demineralizer Regeneration			-		
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.

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 renewal application for their indirect discharge permit.