



State of Ohio Environmental Protection Agency
Southwest District

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

February 28, 2008

Mr. Bill Sanders
Hobart Corporation
1495 North High Street
Hillsboro, Ohio 45133

Re: Hobart Corporation – Hillsboro – Annual Inspection

Dear Mr. Sanders:

On January 30, 2008, I conducted the annual industrial user (IU) inspection at the Hillsboro facility. The facility was represented by Terry Britton. Hobart Corporation is regulated under the Metal Finishing Existing Source Standard, 40 CFR 433.15. The inspection covered the machining area, the scale area, the painting area, and the water jets.

The facility is the same as it was during last year's inspection, but there will be major changes over the next year. The facility has had two daily violations and one monthly for chromium since the last inspection. The daily violation in March 2007 resulted in a monthly violation. These have already been addressed in a Notice of Violation (NOV) dated July 30, 2007. There was a second daily violation in January 2008. This will be addressed in a separate NOV. Resampling in January 2008 showed the facility had returned to compliance. The facility has been doing additional chromium sampling in the discharge and in the various tanks of the five stage parts washer. It appears that the chromium is coming off of the castings in the first two stages (the soap tank and its rinse tank) of the washer. The chromium appears to be present in the residual coolant on the parts that are received from China. The facility is doing some additional sampling to verify this. The facility will be losing its machining operations at the Hillsboro facility, and replacing them with assembly operations. The Hobart washers and burnishers will be removed. This will not affect the overall volume of the wastewater generated at the site. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Hobart Corporation manufactures food processing equipment for the grocery stores, food packaging and restaurant industries. The products produced at this facility include scales, food wrappers, rotisserie ovens, and various sizes of commercial mixers with their accessories. The facility has purchased Mannhart Company. Mannhart produces commercial salad spinners and food processors. In addition, Berkel, another division owned by Hobart, manufactures bread slicers, slicers and meat tenderizers. The assembly of some of this equipment is being moved to the Hillsboro location.



Regulated Process Flows

The majority of the process flow is generated from the iron phosphating line. The second and fourth stages continuously overflow into a trench drain that flows to the sewer. When the process baths are changed out, they are also discharged into the sewer. GE Betz is still the chemical supplier for the line. They are assisting the facility with keeping the baths running and clean. The powder coat line that follows the iron phosphating line is running as designed. The facility has begun recycling approximately 30% of their used powder coat. The mixed colors are used to spray internal parts. The facility is also working on a stainless steel colored powder-coat. This is currently being used on the smaller mixers, and is working on moving it up to the larger models. The facility is working on a new powder coat process for its mixers. This would eliminate the need for the ovens to cure the powder coat. The phosphate line would still be used for cleaning of the castings, but the powder coat would cure on the castings as it is being sprayed. The powder paint itself would be a thermoplastic paint versus the current thermoset powder paint that is being used. This would allow any imperfections in the paint to be heated and repaired instead of having to remove the powder coat and repaint.

The facility is still producing the rotisserie oven line. The facility is still working on the self-cleaning rotisserie oven line. The commercial ovens are sold to grocery stores and retailers. To produce these ovens, the two water jets are being used. The water jets eliminate the need for some of the shearing and punching. These water jets use a mixture of a garnet powder and high pressure water stream to cut out various shapes. The majority of the water is recycled back into the water jet. The solids are filtered out and disposed of by Rumpke. There is a small amount of overspray that flows into the sewer. The water flows through a solids separator prior to entering the floor drain. It is estimated that the flow rate is 100 gallons per day. The exact amount has not been determined. The flow is present at the sampling location. The accessories for the mixers are still being made at Hillsboro. This includes the dough hooks, whisks and bowls. The wastewater was not impacted by this addition.

Sampling

The facility is sampling at the location described in its indirect discharge permit. The dilution flows need to be reported on the self-monitoring reports. There was no sample collected during April 2007. However, there were samples collected on March 28 and May 3, 2007. This will serve as the notification for this frequency violation.

Waste Collection and Disposal

Safety Kleen is taking the solvents from the self-contained parts washing stations. This is being done every eight to twelve weeks. After the machining operations leave the facility, there will only be three of these left. The used coolant is being taken by United Waste

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Water Services for disposal. The scrap metal is taken to Wilmington Iron and Metal. Rumpke Waste is taking the solid waste including the solids from the water jets to Georgetown for disposal. The coolant drippings from the scrap metal and any excess water from the water jet solids flow into the trench drain and are transferred to the above ground storage tank in the building. The solids buildup from the water jet waste is being checked to prevent the tank from filling with solids.

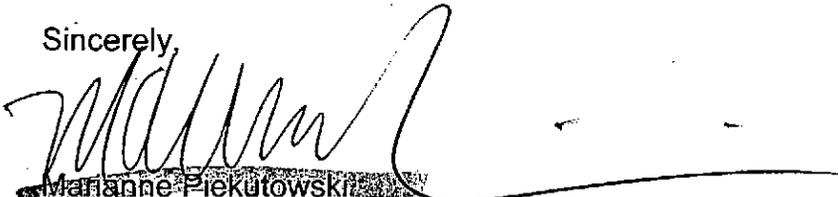
The facility is working on a waste minimization program in the scale area. Studies are being done on the volume and types of waste being disposed of, and then looking into other alternatives to reduce this waste. Depending upon the outcome of the pilot project in this area, the program may be taken facility-wide.

REQUIRED ACTION

Hobart Corporation must report the dilution flows on its self-monitoring report. This must begin with the report due in June 2008.

If you would have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,



~~Marianne Piekutowski~~
District Pretreatment Coordinator
Division of Surface Water

Enclosure

Cc: Terry Britton, Hobart
Brandon Leeth, Hillsboro
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
1DP00019*EP	OHP000086	01/30/2008	IU	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Hobart Corporation 1495 North High Street Hillsboro, Ohio 45133		10:40	03/01/2005
		Exit Time	Permit Expiration Date
		12:30	02/28/2010
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Terry Britton, Maintenance Manager		937.840.5109	
POTW Receiving Discharge		Categorical Standard(s) or Other Classification	
City of Hillsboro		40 CFR 433.15	

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)

See attached report.

Inspector		Reviewer	
	2/28/08		2/29/08
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: **Hobart Corporation**

Date of inspection: **January 30, 2008**

OH Number: **OHP000086**

IDP Number: **1DP00019*DP**

Facility Representative: **Terry Britton**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **January 10, 2007**

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

The facility had a daily and a monthly chromium violation in March 2007. These were addressed in a Notice of Violation (NOV) sent on July 30, 2007. There was no sample collected in April 2007, however, there were two samples collected in March 2007 and in May 2007. The facility needs to report the dilution flow on its 4519s. In January 2008, the facility had another chromium violation. They have resampled and were in compliance. The source for the chromium is being investigated. The January 2008 violation will be addressed in a separate NOV.

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:

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

The facility needs to report the dilution flows. This was noted in last year's inspection.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **185** 6. Shifts/Day: **2**

7. Production Days/Year: **243** 8. Hours/shift: **8**

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

The facility will be outsourcing the machining. The Hillsboro facility will be doing assembly only. The washers and burnishers associated with the machining will be removed from the facility, but this will have only minimal impacts on the wastewater. The phosphate washer and paint line will remain on-site.

10. General facility description and operations:

Manufacture food machines, rotisserie ovens, mixers, and scales. The facility also owns a company named Berkel. They manufacture bread slicers, slicers, and meat tenderizers. Hobart has also purchased Mannhart Co. They manufacture commercial salad spinners and food processors.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:

The facility is investigating a new paint technique. This would eliminate the need for the curing ovens. It is a new type of powder coat being used in the marine industry.

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

There will be additional assembly brought on-site, however, the machining operations are being removed from the facility. The washers and burnishers associated with the machining will be leaving. The impact on wastewater generation will be minimal because the five stage parts washer and water jets will remain on-site.

WASTEWATER TREATMENT

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

There is no pretreatment equipment at this facility.

14. Was a PTI issued for the treatment system? NA

15. Were there any modifications to the treatment system since the previous inspection? NA

If yes, was a PTI obtained? NA

PTI Number: **NA** Date: **NA**

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

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system? NA

18. How often is the treatment system checked? NA

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? NA
Explain:

20. Is there an operations and maintenance manual? NA

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

22. Are there any bypasses in the system? NA
If yes, describe the location:

Have bypasses occurred since the last inspection? NA

Was the POTW notified? NA

23. Are residuals or sludges generated? Y/N

Method of disposal:

Safety Kleen takes the residuals from the parts washer. This is classified as non-hazardous. Rumpke is taking the solid waste from the water jets to its Georgetown Landfill. Wilmington Iron and Metal is taking the scrap metals. After the machining has left the facility, there will only be three parts washers left.

Frequency and amount of disposal:

Safety Kleen comes out every eight weeks to maintain its parts washer. A few of the parts washers are on a twelve week cycle.

Name of hauler/landfill/disposal facility:

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
1) Parts washer, phosphating	End-of-Pipe	14,745	10 - 11,000		
2) Hobart washer (will go)	End-of-Pipe		100*		
3) Burnisher (will go)	End-of-Pipe		**		
4) Water jets (2)	End-of-Pipe		***		
Total Regulated Process Flow					
Non-Contact Cooling			400		
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			-		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary	7,368		6,000		
TOTAL FLOW	22,113		17,500		

* - Two shifts.
 ** - Wastewater varies upon usage of the burnisher.
 *** - There is a very small amount of overflow (~ 100 gpd). The water usually recycles.

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

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

SELF MONITORING

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

The manhole prior to the discharge entering the sewer.

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?

Use water meter readings.

If estimated, describe method of estimation:

Did an estimation based on the timing of flow into a bucket.

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 ***Time composited.*** 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:

Belmont Park Labs

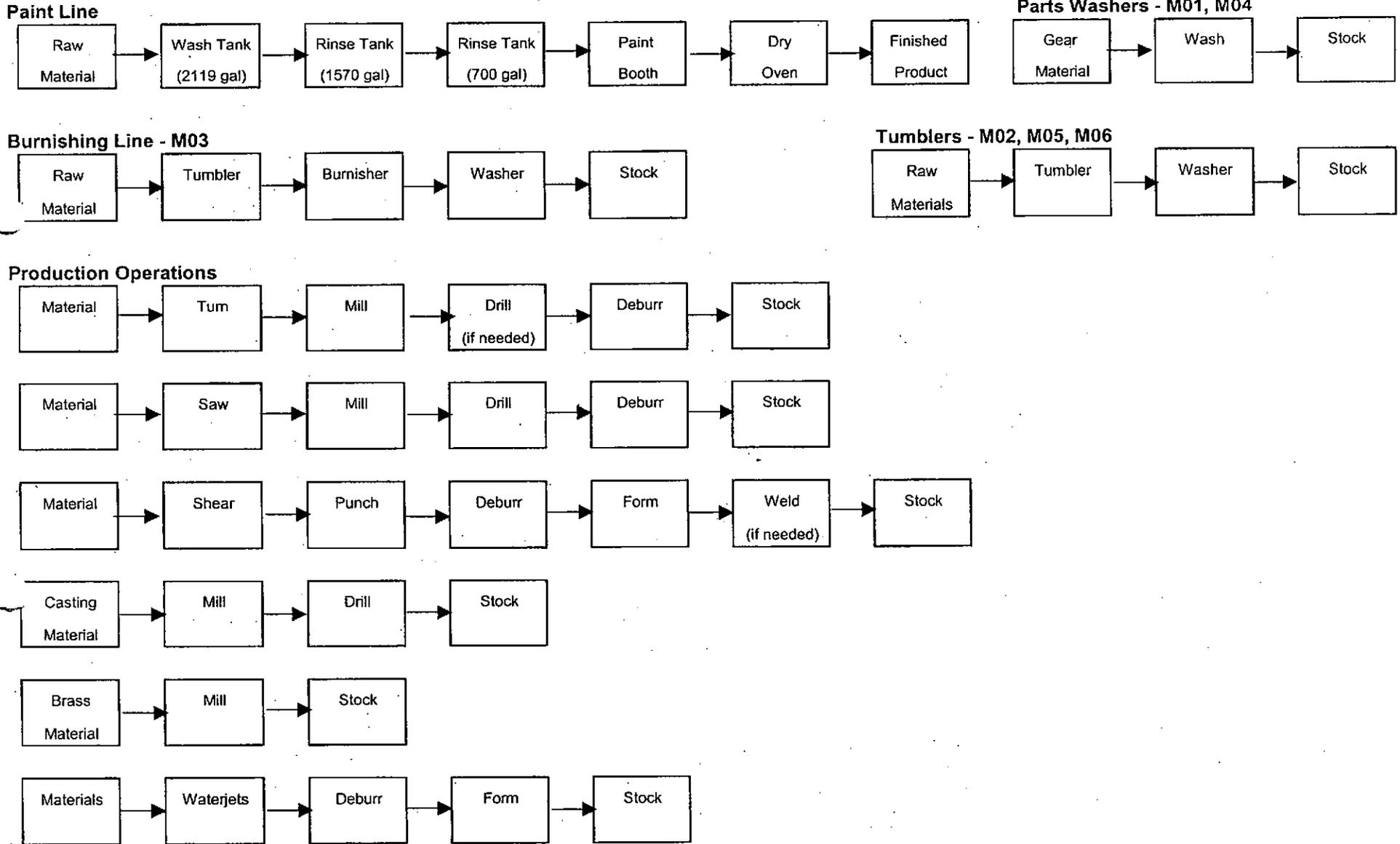
TOXICS MANAGEMENT

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

REQUIRED FOLLOW-UP ACTIONS

1) Hobart Corporation must report the dilution flows in its self-monitoring reports.

ITW Food Equipment Group Process Schematic



March 9, 2005