



State of Ohio Environmental Protection Agency  
Southwest District

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

March 3, 2009

Mr. Scott Barrera  
PAS Technologies, Inc. – Hillsboro Plant  
214 Hobart Drive  
Hillsboro, Ohio 45133

**Re: PAS Technologies, Inc. -- Hillsboro -- IU Inspection & Notice of Violation & SNC Determination**

Dear Mr. Barrera:

On February 5, 2009, I conducted the annual industrial user (IU) inspection at the Hillsboro facility. The facility was represented by Brenda Ferguson and you. PAS Technologies is regulated under the Metal Finishing New Source Standard, 40 CFR 433.17. The inspection covered the machining areas, the nickel line, the acid line, the Fluorescent Penetrant Inspection (FPI) areas, and the areas where the parts washers are being relocated.

The facility has received its indirect discharge permit (IDP) from the State of Ohio. The limits at the facility are very low due to the dilution flows present at the outfalls. There have continued to be violations because there is no dilution flow present. The facility has hired a consultant to help with the violations. Because of these violations, the facility was in significant non-compliance (SNC) for the following:

- SNC Technical Review Criteria (TRC) for Monthly Nickel for the 1<sup>st</sup> half of 2008 at outfall 001;
- SNC TRC for Monthly Nickel for all of 2008 at outfall 002;
- SNC TRC for Monthly Copper for the 2<sup>nd</sup> half of 2008 at outfall 002;
- SNC TRC for Monthly Zinc for the 2<sup>nd</sup> half of 2008 at outfall 002; and
- SNC TRC for Monthly Silver for the 2<sup>nd</sup> half of 2008 at outfall 002.

Because of this, the facility will receive an overall rating of marginal.

Brief Description of Facility

PAS Technologies, Inc. does aviation component repair. It is also an Original Equipment Manufacturer (OEM) of new parts.

Regulated Process Flows

The facility has nickel strip/plating process, FPI rinse water, alkaline cleaner, leak detection solution, film processor water, and non-contact cooling water. There are also numerous machining and welding operations. Because of the nickel line, the facility is regulated under 40 CFR 433.17. The wastestreams that are not discharged are taken off-site for disposal by Safety Kleen. The facility has obtained a Permit to Install (PTI) and indirect discharge permit modification for the installation of an evaporator unit for its oily wastewaters. This will allow the facility to reduce the amount of waste



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going out to Safety Kleen. In addition, the nickel plating process has been moved to the old building. This is where the work is being done.

PAS Technologies has two sections of its facility that generate the regulated process flow. These are called the old and new buildings. Each of these buildings has discharges to the sanitary sewer. There is an acid line that is used to strip parts. The rinse water and scrubber water from this line are discharged to the sanitary sewer when the line is operating. Any used acid is currently taken off-site for disposal as a hazardous waste by Safety Kleen. There is also an FPI line in this building. There is also an alkaline cleaning machine in this building. Each of these flows was included in the calculation for the combined wastestream formula.

There are dilution streams present in the new building. There is non-contact cooling water from the furnaces used on-site. The cooling water is on a closed loop system. The system has a holding tank for the water, and a cooling tower on the roof. When the conductivity in the water is too high, the water is bled off to the sanitary sewer. Sanitary flow is also present at the sampling location. Values from Ohio EPA's Green Book were used to determine the amount of sanitary flow present. A value of 20 gpd/employee was used. The storage tank for the oily waste is also located in the new building. Oily waste associated with machining operations and floor washing are stored in this tank. Oils are skimmed off the tank, and placed in the evaporator. The remaining oils are taken by Safety Kleen for disposal off-site.

The old building has a number of the same flows that are present in the new building. These would include a discharge of FPI rinse water and alkaline cleaning. In addition, this facility has leak detection solution that is used to check aircraft components for leaks and film processor water. Each of these flows are present at the sampling location. In addition, there are dilution flows from non-contact cooling water from furnaces and chiller water associated with the film developing. There are two additional machines in the old building that have closed loop systems. There is a closed loop water jet stripper machine. There is no discharge from this unit. The metals sludge from the machine is taken by Recycling Coordinators in Akron for recycling. There is also a plasma (thermal) spray machine. This machine is used to rebuild worn surfaces on parts. There is a water curtain on this machine that operates on a closed loop. Veolia would take any water for disposal from this machine.

Wilmington Iron and Metal take the turnings, etc. that are steel and aluminum. Recycling Coordinators take the more exotic aircraft metals for recycling. The facility did not install a small reverse osmosis unit in the old building. A water softener was installed instead.

### Sampling

The facility has installed sampling manholes on the discharge lines from each of the buildings. The sampling manholes have a flume and flow meter. The batteries used in these manholes are recharged with solar panels on the manhole lids. The facility has a Toxic Organics Management Plan (TOMP). In addition, there appears to be an error in the number of Total Toxic Organics (TTOs) samples required on outfall 002. Samples are listed as being needed every two months versus twice per year. This will be corrected when the permit is modified to reflect the new parts washer and re-routing of flows. Since the facility is certifying for this parameter, they are meeting their permit requirements.

The facility has been sampling in accordance with its indirect discharge permit. The following violations were noted:

<b>Outfall</b>	<b>Parameter</b>	<b>Date</b>	<b>Reported</b>	<b>Units</b>	<b>Permit Limit</b>
001	Nickel, Total	2/2008	637	ug/L	480 ug/L
002	Copper, Total	02/14/2008	881	ug/L	520 ug/L
002	Nickel, Total	02/14/2008	905	ug/L	610 ug/L
002	Zinc, Total	02/27/2008	456	ug/L	400 ug/L
002	Copper, Total	06/2008	326	ug/L	320 ug/L
002	Nickel, Total	06/2008	448	ug/L	370 ug/L
002	Nickel, Total	12/2008	1,453	ug/L	370 ug/L
002	Copper, Total	12/2008	418	ug/L	320 ug/L
002	Silver, Total	12/2008	256	ug/L	37 ug/L
002	Zinc, Total	12/2008	333	ug/L	230 ug/L
002	Copper, Total	12/09/2008	893	ug/L	520 ug/L
002	Nickel, Total	12/09/2008	7,540	ug/L	610 ug/L
002	Chromium, Total	12/09/2008	728	ug/L	430 ug/L
002	Zinc, Total	12/09/2208	580	ug/L	400 ug/L
002	Silver, Total	12/17/2008	241	ug/L	66 ug/L
002	Zinc, Total	12/17/2008	433	ug/L	400 ug/L
002	Silver, Total	12/22/2008	1,250	ug/L	66 ug/L
002	Zinc, Total	12/22/2008	711	ug/L	400 ug/L
002	Copper, Total	12/22/2008	811	ug/L	520 ug/L

There have been no dilution flows discharged, but the limits have the combined wastestream formula applied to account for the dilution flow. The facility has retained a consultant to help address the issues. This will be addressed in the form of an indirect discharge permit modification since there won't be any treatment being added just the re-routing of flows. The facility is also in SNC as specified earlier in the report. Please note that failure to comply with the permit limits is a violation of Ohio Revised Code 6111.

#### Waste Collection and Disposal

Safety Kleen takes the bulk of the wastes generated on-site. Scrap metals are recycled through Wilmington Iron and Metal, and Recycling Coordinators. The facility has built a new storage building for waste storage and metal chips.

#### REQUIRED ACTION

PAS Technologies must continue to work to return to compliance with its discharge limitations. The permit modification and plan for the plant repiping must be submitted by April 30, 2009.

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If you would 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

Enclosure

Cc: Ryan Laake, DSW/CO  
Brandon Leeth, Hillsboro  
Brenda Ferguson, PAS Technologies, Inc.



State of Ohio Environmental Protection Agency  
Southwest District Office

Pretreatment Compliance Inspection Report

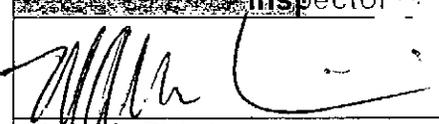
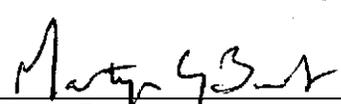
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00081145	OH-P000017	02/05/2009	IU	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
PAS Technologies, Inc. – Hillsboro Plant 214 Hobart Drive Hillsboro, Ohio 45133	9:15 am	08/01/2006
	Exit Time	Permit Expiration Date
	11:00 am	07/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Scott Barrera, Safety & Environmental Services Manager Brenda Ferguson, Human Resources	937.840.1076 937.840.1003	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
City of Hillsboro	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: 3/3/09	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 3/3/09

# INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **PAS Technologies, Inc.**

Date of inspection: **February 5, 2009**

OH Number: **OHP000317**

IDP Number: **1DP00051\*AP**

Facility Representative: **Scott Barrera, Brenda Ferguson**

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:

**There was one monthly nickel violation at 001. There were 3 daily copper, 2 daily nickel, 4 daily zinc, 2 daily silver, and 1 daily chromium violations. There were 2 monthly copper, 2 monthly nickel, 1 monthly zinc, and 1 monthly silver violation. These are related to the lack of dilutions flows. The outfalls have the combined wastestream formula applied for this dilution flows. This 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: **80 (3 temps)**      6. Shifts/Day: **1 full shift, 2 partial (10 on second shift) (3 on third shift)**

7. Production Days/Year: **312**      8. Hours/shift: **8**

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

**The facility moved in additional lines from the Tulsa plant. The facility will be adding a new parts washer. The flows will increase at that time. The facility will be submitting a permit modification request at that time.**

10. General facility description and operations:

**Aviation component repair. The facility is also an original equipment manufacturer (OEM) of new parts.**

**FACILITY OPERATIONAL CHARACTERISTICS CONTINUED**

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

*The facility has changed the soap used in the parts washer. Turco Spray-Ease NP LT is now being used.*

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

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**WASTEWATER TREATMENT**

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

*There is an evaporator for the oily wastewaters. The residuals from this are disposed of off-site.*

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: **650245** Date: **March 25, 2008**

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

If batch, list the frequency and duration:

*Once per two weeks. There are approximately 200 to 300 gallons per batch.*

17. Who is responsible for operating the treatment system?  
*Two maintenance department staff operate the evaporator.*

18. How often is the treatment system checked?

*The system is automated. There is no discharge to the sanitary sewer.*

**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? Y/N  
If yes, list:

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

Have bypasses occurred since the last inspection? NA Y/N

Was the POTW notified? NA Y/N

23. Are residuals or sludges generated? Y/N

Method of disposal:

***Oily wastewater (spark line water, mop water & machine coolant), furnace and machine hydraulic oils is treated on-site with an evaporator. The concentrate from the evaporator, acid line filters, and used acid – All taken by Safety Kleen***

Frequency and amount of disposal:

***Oily waste – 1,000 gallons per six weeks to evaporator. 300 to 400 gallons of oil.  
Used acid – 100 gallons per year  
Acid line filters have not gone out in two years. There is one drum. This is approximately three years worth. There may be more now at approximately one drum a year. The acid line is running more. The facility is sending out more drums, but still are a small quantity exempt generator.***

Name of hauler/landfill/disposal facility:

***Safety Kleen.  
Scrap metals are being taken by Recycling Coordinators.***

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

***The acid filters and used acid go out as hazardous waste.***

If land applying sludge, is there a sludge management plan? NA 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) FPI	End-of-Pipe	200	200-300		
2) Acid Line Scrubber	End-of-Pipe	300	600 gal		
3) Alkaline Parts Washer	End-of-Pipe	200	300		
4) Film Processor	End-of-Pipe	250	250		
<b>Total Regulated Process Flow</b>					
Non-Contact Cooling		1,600	1,600	<i>Acid Line Scrubber discharges at 2 gpm (Can be 0.6 gpm when idle, and 1.2 gpm when on.)</i>	
Blowdown					
Reverse Osmosis					
Demineralizer Regeneration					
Filter Backwash				<i>The sanitary flow is based on 20 gal/employee from Ohio EPA's Green Book.</i>	
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary		1,200	1,200		
<b>TOTAL FLOW</b>					

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

*The facility has received coverage under the "No Exposure" certification.*

**SELF MONITORING**

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

**Outfall 001 – The sampling manhole for the new building installed on the sewer line that discharges to Homestead Ave.**

**Outfall 002 – The sampling manhole for the old building installed on the sewer line that discharges to Homestead Ave.**

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?

If estimated, describe method of estimation:

**The facility also looks at water usage when the meters are not working.**

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:

**Test America.**

**TOXICS MANAGEMENT**

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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:

*The facility has an SPCC plan. This was updated to reflect the moving of equipment to the new storage building.*

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**REQUIRED FOLLOW-UP ACTIONS**

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*PAS Technologies must return to compliance with its discharge limits.*

