

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Cheryl Kofas, Director

October 15, 2010

Mr. Greg Fritz
Brainerd Industries, Inc.
680 Precision Court
Miamisburg, Ohio 45342

**Re: Brainerd Industries, Inc. -- Miamisburg -- IU Inspection & Notice of
Violation – SNC Determination**

Dear Mr. Fritz:

On September 30, 2010, I conducted the annual industrial user (IU) inspection at the Brainerd Industries facility. The facility was represented by Doug Russell and yourself. The facility is considered to be a significant industrial user (SIU) as defined in Ohio Administrative Code (OAC) 3745-36-02(U)(1) due to the fact the facility is subject to categorical standards. Because of the iron phosphating operation, the facility is regulated under 40 CFR 433.17, New Source Metal Finishing Standard. The inspection covered the iron phosphating line and the alkaline parts washer.

The facility submitted its self-monitoring report for the first half of 2010 on October 13, 2010. It was due on July 15, 2010. Since this was more than 45 days late, the facility was in significant non-compliance (SNC) for late reports. This has been addressed. In addition, the facility must include the Total Toxic Organics (TTO) certification statement in its report. The parameter should be coded "AH", and the statement entered into the "Notes" box pop up. Because of this, the facility will receive a rating of marginal.

Brief Description of Process

Brainerd Industries, Inc. manufactures cosmetic trim parts for Original Equipment Manufacturers (OEMs) in the consumer electronics, appliance, television, computer, and automotive industries. Brainerd utilizes a variety of manufacturing operations including stamping, blanking, die cutting, printing, and powder coating of metal and plastic products. These products include screen printed decorative metal and plastic trim for graphic overlays, panels, dials, escutcheons, and nameplates. The facility also produces custom powder coated metal speaker grilles in perforated and expanded metal for audio, automotive, television, and computer applications.

Description of Regulated Process Flows and Wastewaters

There are two sources of regulated wastewater at the facility. The first source is the discharge from the five stage iron phosphate parts washer. The washer is designed to clean and prepare the surface of the base materials for painting. Wastewater is generated daily from the continuous overflow from the rinses in Stages 2 and 4. Stages 1, 3, and 5 are the concentrated solutions used in the process. Stage 1 is a cleaner that will tend to be basic. Stage 3 is the iron phosphate tank. This will be acidic. Stage 5 is a product that aids in coating adhesion and corrosion resistance. This will be acidic. The pH will be checked prior to discharge, and will be adjusted as needed. The baths can either be discharged together and self-neutralize, or be adjusted in the tank prior to discharge. There will be a discharge of approximately 6,000 gallons per day (gpd) if the concentrated baths are discharged. From this line, the parts are then powder coated.

The second source of process wastewater is a small alkaline parts washer. Since the iron phosphating line is present, this line is also regulated. This is a three part process. The wash line cleans the aluminum sheets used for signs and business cards, etc. The sheets are automatically fed into the washer, sprayed with cleaner to remove any oils, fingerprints, dust, or other particles that could interfere with the quality of the print surface. Following the cleaner application, the sheet is moved onto a roll conveyor to the rinse portion of the unit. The rinse portion consists of multiple water jets that spray fresh water onto the sheet to remove the alkaline cleaner and any debris. The sheet continues on the roll conveyor to the dryer portion of the unit. This consists of blowers moving ambient air across the surface of the sheet metal. Once the cleaning process is complete, the sheets are moved to the printing department. The rinse water runs continuously when the washer is operating. The flow rate is estimated to be 2,800 gpd. This will discharge to the sanitary sewer via a floor drain. The cleaner tank would be discharged approximately once a quarter. Some of the materials used in this process do not require the alkaline wash since they are clean when received. The flows from this line are down. The 500 gallon tank is only emptied on an as needed basis.

The drains in the silk screening printing area have been covered except for where the discharge from the small alkaline cleaning line discharges.

There is a separate chemical storage room. This room does not have any drains, and is separated from the rest of the facility. There was a spill kit located by the storage room. The facility does not appear to have the potential to slug load the wastewater treatment plant. The floor drains are blocked, or are not present where there are potential releases.

Sampling

The facility has obtained a Toxic Organics Management Plant (TOMP). When the

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sampling reports are submitted, the TTO certification statement must be included. The language is in the October 1, 2010 letter. The self-monitoring report for the first half of 2010 was submitted late. The reports must be submitted in a timely manner.

Storm Water Discharges

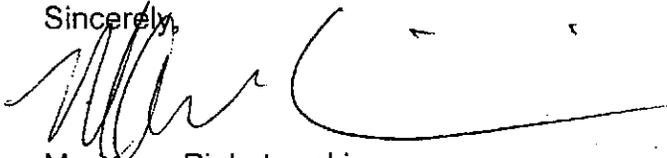
The facility has received coverage under the general industrial storm water permit.

REQUIRED ACTIONS

- 1) Brainerd Industries must submit its self-monitoring reports in a timely manner. This must begin immediately.
- 2) Brainerd Industries must include the TTO certification statement in its self-monitoring reports. This must begin with the next self-monitoring report (due January 15, 2011).

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

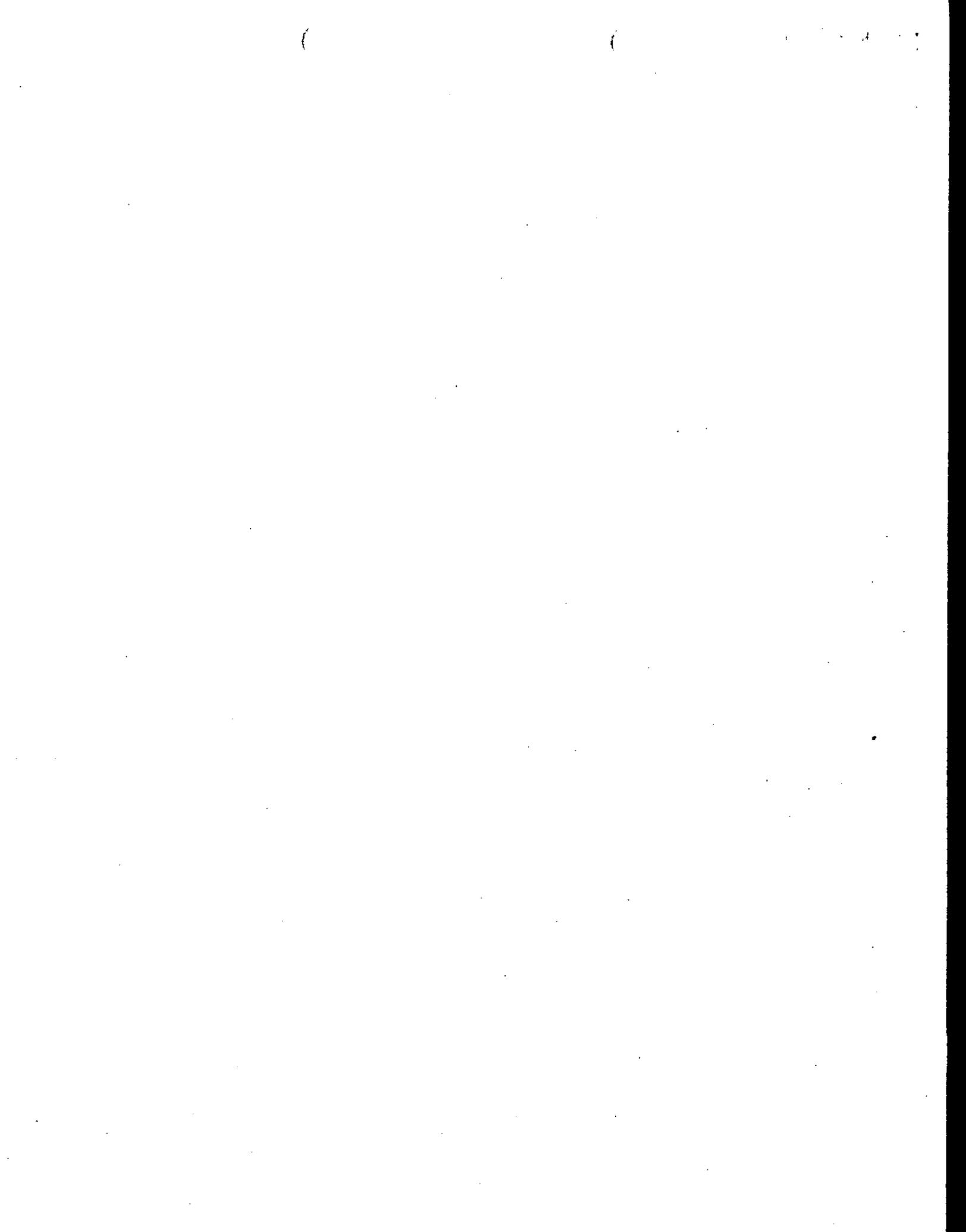
Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Ryan Laake, DSW/CO
Dave Reinker, Miamisburg
Doug Russell, Brainerd Industries, 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
1DP00052*AP	OHP000235	09/30/2009	I	S	2

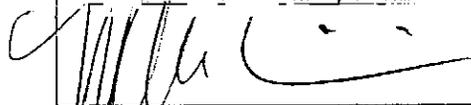
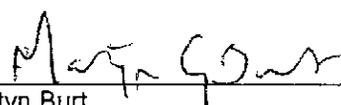
Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brainerd Industries, Inc. 680 Precision Court Miamisburg, Ohio 45342	9:05 am	02/01/2008
	Exit Time	Permit Expiration Date
	10:25 am	01/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Fritz, President Doug Russell	937.228.0488x201	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
City of Miamisburg WWTP	40 CFR 433.17	

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Pretreatment		
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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: 10/15/10	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 10/18/10

INDUSTRIAL USER INSPECTION CHECKLIST

Facility **Brainerd Industries, Inc.**

Date of inspection: **September 30, 2010**

OH Number: **OHP000235**

IDP Number: **1DP00052*AP**

Facility Representative: **Greg Fritz, Doug Russell**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **July 14, 2009**

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

The self-monitoring report due on July 15, 2010 was not submitted until October 13, 2010. The TTO Certification statement in the October 1, 2010 letter must be included in the Notes for the TTO parameter. This will serve as the Notice of Violation for these items. Since the report was more than 45 days late, the facility is in significant non-compliance (SNC) for late reporting. Since the report has now been submitted, the SNC is resolved.

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:

The report due on July 15, 2010 was not submitted until October 13, 2010.

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

The items were completed.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **28**

6. Shifts/Day: **1**

7. Production Days/Year: **~250**

8. Hours/shift: **8 (some overtime, but nothing steady)**

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

Production is up some from last year, but not where it had been pre-recession.

10. General facility description and operations:

Manufacture trim parts, metal decorators, and plastic decorators. Also provide silk screening.

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:

Production is down. The facility is hoping things get back to normal.

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: **NA** Date: **NA**

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

If batch, list the frequency and duration:

There is a continuous overflow from the rinse tanks, and there is a batch discharge from the concentrate tanks. The concentrate tanks are mixed to neutralize pH prior to discharge.

17. Who is responsible for operating the treatment system?

Connie Trivette

18. How often is the treatment system checked?

The batch tanks are checked prior to discharge. The line is tested daily for process control.

WASTEWATER TREATMENT CONTINUED

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

NA. There is no treatment system.

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

21. Is an inventory of critical spare parts maintained? NA 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? Y/N

Was the POTW notified? Y/N

23. Are residuals or sludges generated? Y/N

Method of disposal:

There will be some sludges generated, but there have been none generated to date.

Frequency and amount of disposal:

It is too soon. The lines are new.

Name of hauler/landfill/disposal facility:

KlorKleen did take iron phosphate, but haven't done this lately.

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

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) Five Stage Parts Washer	End-of-process	6,000	5,000		
2) Alkaline Parts Washer	End-of-process	2,800	-500		
Total Regulated Process Flow		8,800	5,500		
Non-Contact Cooling				<i>The use of the alkaline parts washer is down. It is only discharged on an as needed basis.</i>	
Blowdown					
Reverse Osmosis					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW		8,800	5,500		

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:

- 1) *Samples shall be collected from the sump that contains the wastewater from the five-stage parts washer.*
- 2) *Samples shall be collected from the sample port on the effluent pipe of the alkaline parts washer.*

27. Is the facility sampling at the location(s) described in the permit? Y / N
If no, describe the actual location:

Sample ports were installed as discussed during last year's inspection.

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?
NA

If estimated, describe method of estimation:
Based on previous usage.

30. Is pH monitored continuously? Y / N
If yes, how often is the meter calibrated?
Do not know the frequency of this. There is a batch test once a day.

31. Does the facility collect its own samples? Y / N
If no, specify the sample collector:
The facility will be collecting their own samples.

32. Are appropriate sampling procedures followed?
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 *Bottles received pre-preserved* 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 Laboratories.

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / ~~N~~

If yes, identify organics:

There are solvents used on-site, but they are taken by Midwest Environmental for disposal. The solvents are also present in the inks used as well as in solvent form.

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:

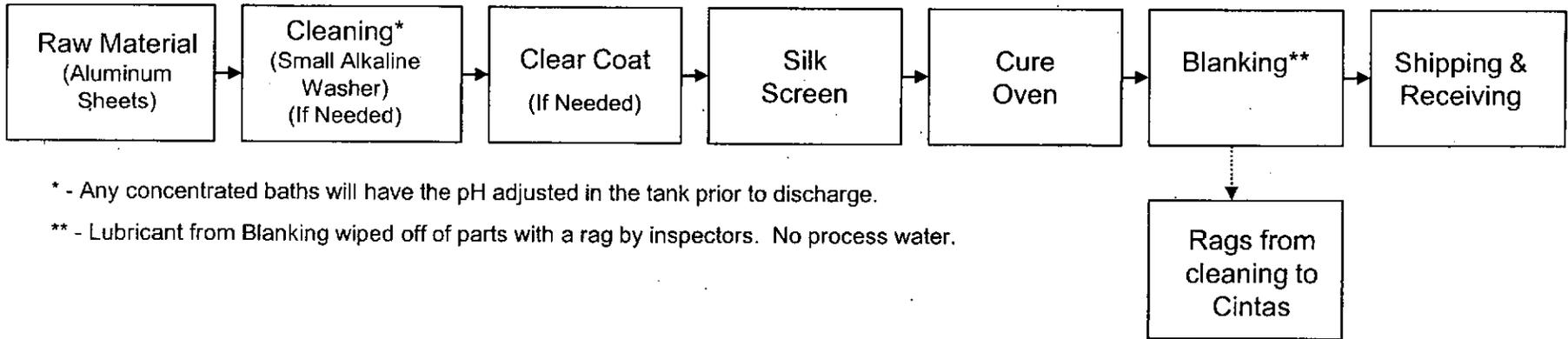
The facility has a separate chemical storage area. The drains in the process area are closed except for the line that drains the alkaline parts washer.

REQUIRED FOLLOW-UP ACTIONS

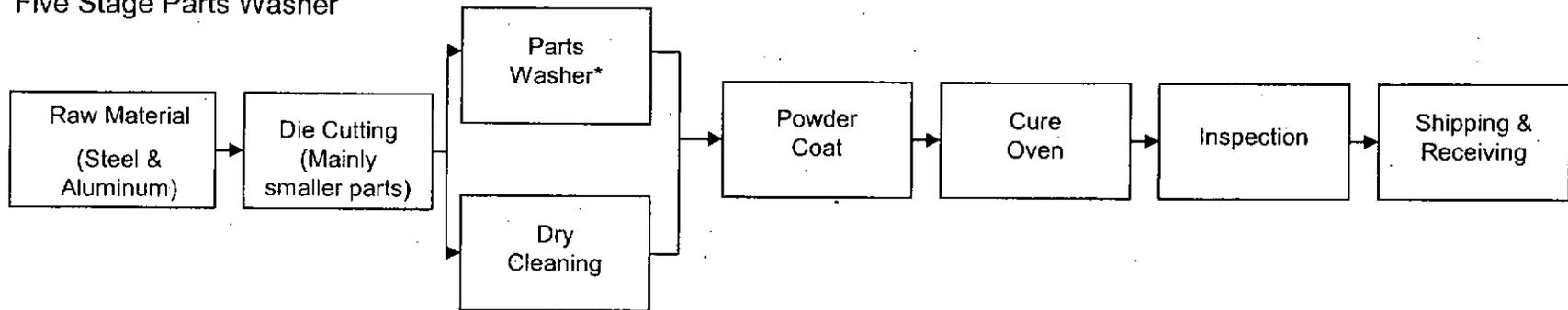
- 1) *Brainerd Industries must include the TTO certification statement in their self-monitoring reports.*
- 2) *Brainerd Industries must submit its self-monitoring reports in a timely manner.*

Brainerd Industries Process and Treatment Schematic

Silk Screening



Five Stage Parts Washer



July 28, 2008