



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 08, 2008

RE: MetoKote Corporation - Plant 13
Pretreatment Compliance Inspection

Mr. Frank Zack
MetoKote Corporation
8040 Center Point 70 Blvd.
Huber Heights, OH 45424

Dear Mr. Zack:

On June 16, 2008 I met with Mr. Jim Batin to conduct a pretreatment compliance inspection. A review of your self-monitoring reports since my last inspection revealed no reported effluent violations which I believe reflects Mr. Batin's excellent operation and maintenance of the pretreatment system. I did note however that dilute flows have not been reported since the current permit became effective. Please ensure future monitoring reports include the estimated amount of dilute flow present from regeneration of the water deionizer system and from boiler blowdowns. The deionizer regeneration flow should be the weekly average daily flow based on the number of regenerations that occur during a week (i.e. three 3,000-gallon regenerations during a five-day production week would equal a daily dilute flow of 1,800 gpd for that source). Also, please note that you are monitoring once a month which is more frequent than the once every two month frequency the current permit allows. I discussed these permitting issues with Mr. Batin and Mr. Husted and they now have a copy of the current permit.

While viewing the two e-coat lines I noted a significant amount of drag-out following the final rinse that appeared to be associated with part racking. If this amount of drag-out is typical of each preceding stage, I encourage you to look for opportunities such as better racking or use of air knives as means of reducing wastewater volumes and chemical usage (both process and treatment).

I continue to be interested in quantifying the amount of e-coat cooling water subsequently used for rinsing. To follow up on Mr. Husted's November 7, 2007 letter, I request that you provide a diagram that shows all points on Lines 1 & 2 where water is used and wastewater is generated. Water sources and flow rates (and flow ranges) along with destinations should all be shown. I ask that this information be provided by September 1, 2008.

While viewing Line 3, I noted that there was significant amounts of grease on the drive shaft fittings and wondered whether manually removing these large globs would benefit the effectiveness of the alkaline wash stage by minimizing the amount that needed to be washed off. When I saw that these

Mr. Frank Zack
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grease globs can persist all the way through wet painting, I wondered if the grease may present a threat to the quality of the iron phosphate stage should the globs contaminate the phosphate solution. I bring this up only for your awareness and consideration.

Finally, Mr. Batin inquired about possible recognition for MetoKote through the National Environmental Performance Track program <http://www.epa.gov/perftrac/>. This program is administered by USEPA and, as stated on their website:

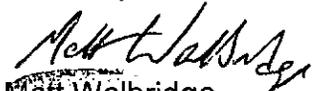
"...recognizes and drives environmental excellence by encouraging facilities with strong environmental records to go above and beyond their legal requirements. Members set typically four public, measurable goals to improve the quality of our nation's air, water, and land. Members include major corporations, small businesses, and public facilities that are steering a course toward environmental excellence.

Currently, the program has more than 500 members and welcomes all qualifying facilities. Applications are accepted twice a year: April 1 - May 31, and September 1 - October 31. Annual performance reports and renewal applications are available on February 1 and due on April 1."

If MetoKote is interested in membership in this program, I encourage you to submit an application as outlined on the website.

If you have any questions concerning this letter, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

ENCLOSURE

CC: Julia Zhang - Ohio EPA / Central Office / DSW



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER
1DP00013*DP

APPLICATION NUMBER
OHP000104

DATE CONDUCTED
June 16, 2008

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
0900

TIME OUT
1100

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**MetoKote Corporation - Plant 13
8040 Center Point 70 Blvd.
Huber Heights, OH 45424**

POTW RECEIVING DISCHARGE

Clark County - Southwest Regional WWTP

MAILING ADDRESS OF FACILITY

**MetoKote Corporation - Plant 13
8040 Center Point 70 Blvd.
Huber Heights, OH 45424**

CONTACT (NAME/TITLE/PHONE)

**Jim Batin / Wastewater Technician / (937)235-2811
Todd Husted / Technical Quality Manager / (937)235-2811**

FACILITY EVALUATION (See Inspection letter for more complete description)

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)

S	Sampling Procedures	NA	Compliance schedule requirements
M	Reporting	NA	Notification
S	Compliance with effluent limits	-	Other -

Name and Signature of Inspector(s)

Matt Walbridge

Agency / Office / Telephone

Ohio EPA / Southwest District Office / (937) 285-6095

Date

7-8-08

Signature of Reviewer

Mark GBS

Ohio EPA / Southwest District Office / (937) 285-6034

Date

7/8/08

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *MetoKote Corporation - Plant 13*

Date of inspection: *June 16, 2008*

Permit Application Number: *OHP000104*

IDP Number: *1DP00013*DP*

Facility Representative: *Jim Batin*

Inspector(s): *Matt Walbridge*

COMPLIANCE

1. Date of last pretreatment inspection: *June 26, 2007*

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

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:

They are sampling at the frequency of their previous permit and not reporting dilute flow which is a new parameter.

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

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *100 (~60 in production)*
6. Shifts/Day: *1*
7. Production Days/Year: *5 to 6-day work week*
8. Hours/shift: *8 to 10*

Lines 1, 2 & 3 all operate one shift.

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

(Facility is still at about 50 % of production capacity.)

10. General facility description and operations:

Two E-coat lines (Line 1 is primarily for cast parts, Line 2 is primarily for sheet metal parts) that include alkaline cleaning and zinc phosphating, a wet paint line (Line 3 - dedicated to automotive drive shafts) that includes alkaline cleaning, iron phosphating, and non-chrome sealing. There is also a tumble blaster (a dry operation).

Automotive parts are primarily what are processed.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

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

WASTEWATER TREATMENT

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

Equalization, pH neutralization, flocculation, clarification, final neutralization, sludge thickening and filter press.

A diagram is attached.

14. Was a PTI issued for the treatment system? Y/~~Y~~/N

15. Were there any modifications to the treatment system since the previous inspection? Y/~~Y~~/N

The old sodium bisulfite feed tank is now used to store defoamer chemical which used to be located next to the final effluent tank.

If yes, was a PTI obtained? N.A. Y/~~Y~~/N

PTI Number: _____ Date: _____

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

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system? ***Mr. Jim Batin***

18. How often is the treatment system checked?

Attended throughout the day. Pretreatment system is operated on 1st shift (6:00 am to 3:00 pm) in continuous treatment mode and then placed in automatic mode the remainder of the day. Wastewater would not normally be processed other than during first shift.

WASTEWATER TREATMENT CONTINUED

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

pH and level alarms. They are tested during calibrations.

20. Is there an operations and maintenance manual? *It is very good.* Y/N

Implementing '5S' throughout the facility. (In Japanese: Seiri, Seiton, Seison, Seiketsu, and Shitsuke. In English: Housekeeping, Workplace Organization, Cleanup, Keep Cleanliness, and Discipline.)

pH meters are calibrated on Mondays and then verified on Wednesdays. The probes are cleaned with water daily. Mr. Batin conducted a calibration during the inspection. A log is maintained.

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

Mixer motors, probes, seals.

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
Pretreatment sludge (~6 yd³/week), zinc phosphate sludge and filter media (from production line).

Method of disposal: **To a 20 yd³ roll-off.**

Frequency and amount of disposal: **20 yd³ approximately once a month.**

Name of hauler/landfill/disposal facility:

Philips-Cousins is the hauler. Evergreen is disposal location.

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

If land applying sludge, is there a sludge management plan? N.A. 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. Washing, Coating and Painting	End of Process (after treatment)	24,000*	~24,000	N.A.	N.A.
Total Regulated Process Flow		24,000	~24,000		
Noncontact Cooling					
Boiler Blowdown			~200 ¹		(1) There is a water softener on the boiler feed line - the regeneration water is directed to the equalization tanks prior to the pretreatment system.
Reverse Osmosis					
Demineralizer Regeneration			~3,000 ²		(2) 3,000 gallons per regeneration approximately three times per week. Directed to equalization tanks prior to treatment system.
Softener Backwash					
Filter Backwash					
Compressor Condensate					
Other Dilute Flows					
Total of Dilute Flows		3,200	~3,200		
Unregulated Flows			-		
Sanitary			(~2,300) ³		(3) Based on 15 gpd/employee. Sanitary flows are not present at the sampling point.
TOTAL FLOW	End of Process (after treatment)	-	~30,000 ⁴		

Note: Potable water is used to cool the e-coat paint tanks through a heat exchanger system and is subsequently used as rinse water following the alkaline washing and zinc phosphating stages. The rate of cooling water appears to exceed the amount of water that would normally be necessary for effective rinsing. This appears to represent an unaccounted source of, effectively, dilution water.

* Facility flows are not limited, but the limits for metals are based on these flows.

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

SELF MONITORING

26. Sample location(s) described in the facility's permit:
"Samples shall be collected from the discharge from the Final pH Neutralization Tank - T9."
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~~
Flow measuring device is set up for each sampling event. MetoKote has a paddlewheel-type meter that is used to record weekly usage.
If measured, how often is the meter calibrated?
Every time the meter is set up.
If estimated, describe method of estimation:
30. Is pH monitored continuously? Y / ~~N~~
If yes, how often is the meter calibrated? **Weekly using 7 and 10 buffer solutions.**
31. Does the facility collect its own samples? ~~Y~~ / N
If no, specify the sample collector: **Test America.**
(MetoKote collects daily samples and analyzes them using Aqua King test kits. These results are not reported but are recorded in a log book with notes indicating what response actions were taken.)
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 (150 to 200 ml / 500 gallons) 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

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: **None noted.**

REQUIRED FOLLOW-UP ACTIONS

Need to report dilute flow as required by the discharge permit (facility apparently did not receive a copy of the renewed permit).

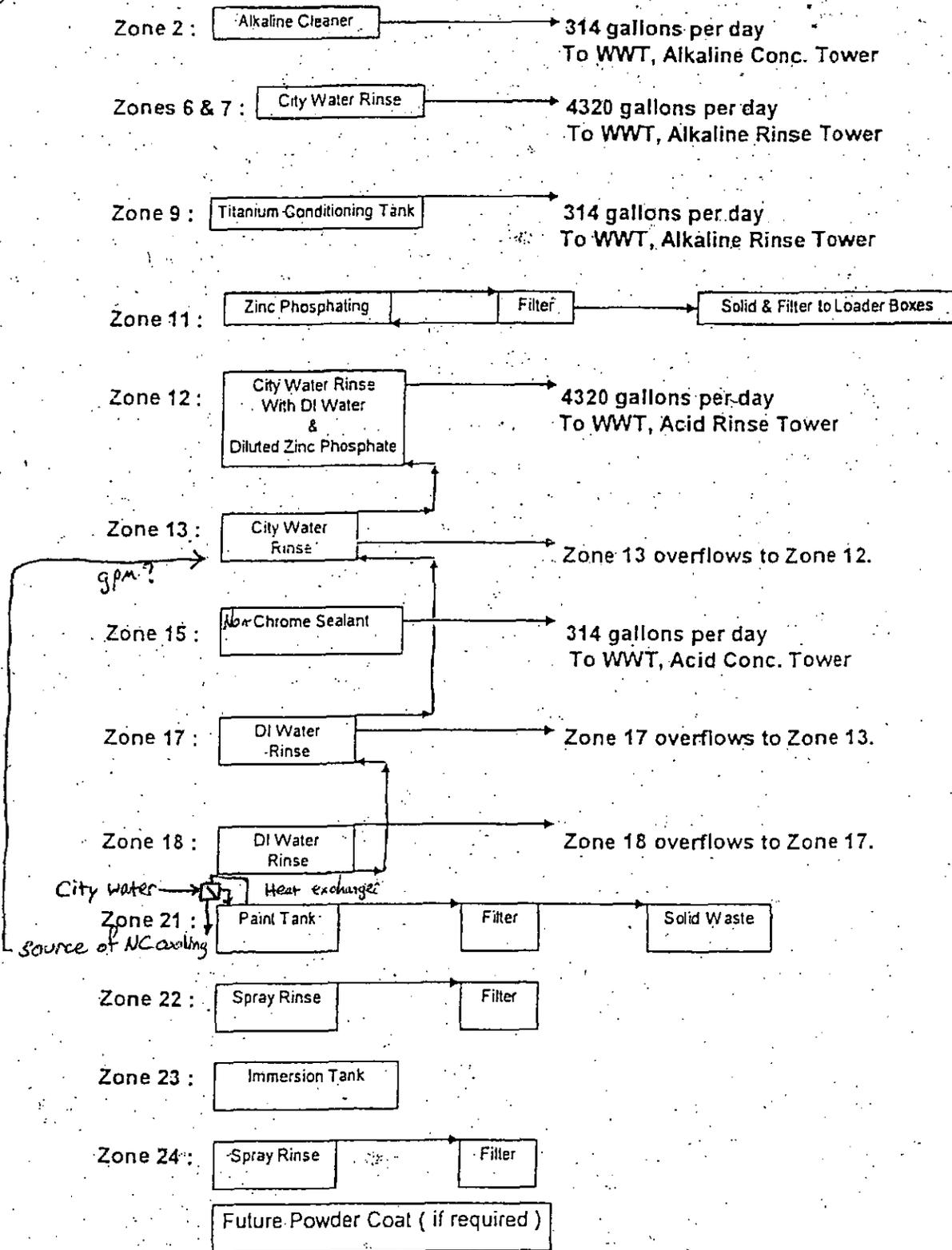
OBSERVATIONS

They are monitoring at the frequency called for by their previous permit (once per month). The current permit calls for monitoring once every other month.

The pretreatment system continues to be extremely well-maintained and operated.

There was a lot of extra grease on the drive shaft fittings that are processed on Line 3. Removing the grease prior to alkaline washing would seem to extend the life of the alkaline wash solution and avoid possible contamination of the subsequent tank solutions.

Process Flow Diagram - MetoKote - Huber Heights
 Approximate Waste Water Generation Schematic
 Lines 1 & 2 Identical Tank Dimension



Total : 9582 gal per day per E-coat line.

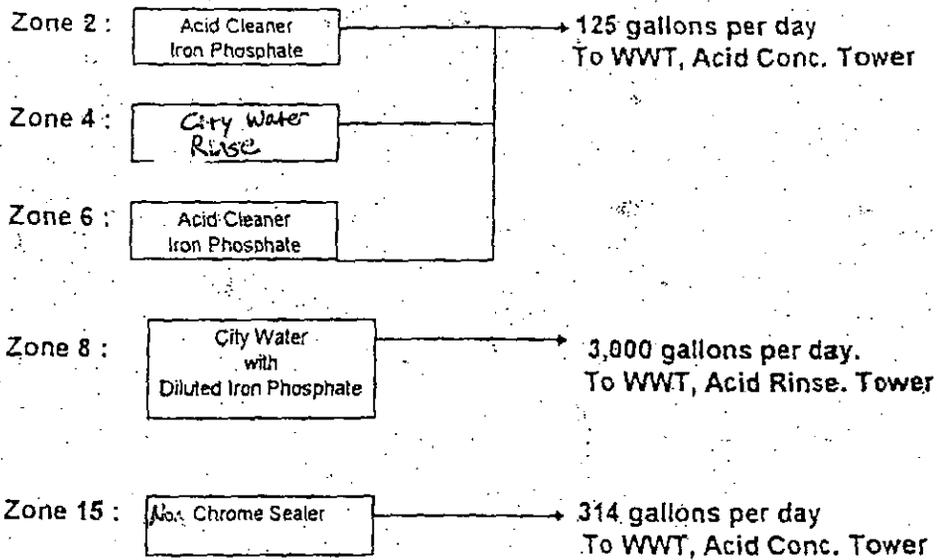
** We Have 2 identical E-coat Lines. Therefore Total Waste Water Generation from both lines is $9582 \times 2 = 19164$ gal per day

** Wet Spray Line generates 3439 gallons of Waste Water per day.

** DI Regeneration waste water is 1000 gal per day.

Grand Total of Waste Water per day 23601 gallons.

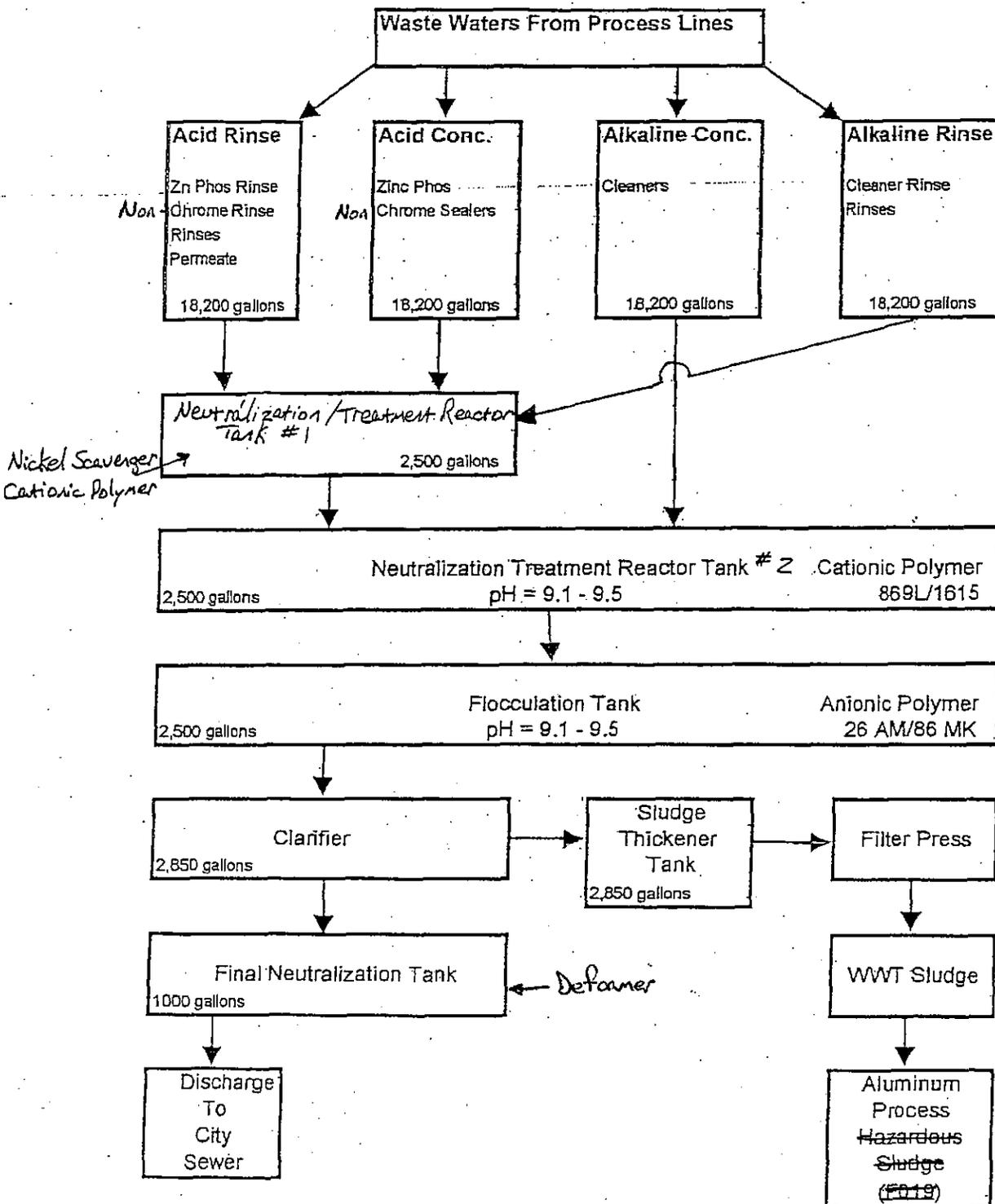
Proc Flow Diagram - MetoKote - Huber Heights
Approximate Waste Water Generation Schematic
Line 3



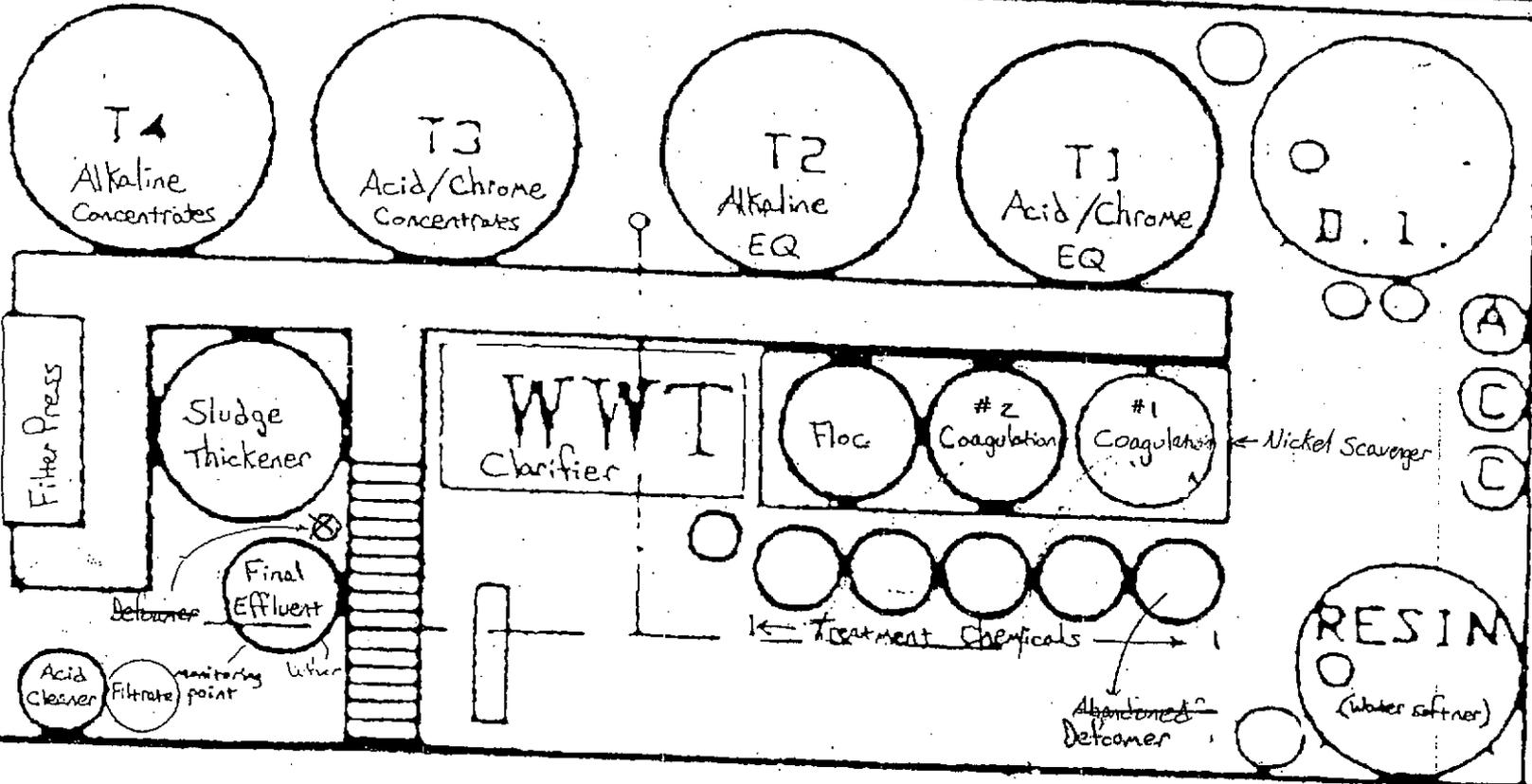
Total : 3439 gal per day from Wet Spray line.

Waste Water Treatment Flow Diagram Plant 13

updated July 2008



NE corner



(From ~~6-16-98~~ inspection)
6-16-98

Metokote - Plant 13.

Retreatment System

16' x 16'

OHD

