Ohio | Environmental Protection Agency

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

June 9, 2011

RE: Pretreatment Compliance Inspection and Notice of Significant Non-Compliance

Mr. Tom Myers
Millat Industries Corp. - MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424

Dear Mr. Myers:

On June 7, 2011 I met with you to conduct a pretreatment compliance inspection of your facility's operations. It was revealed that Millat has failed to submit a discharge monitoring report for the period of July through December 2010 which causes Millat to be in significant non-compliance (SNC). You provided me monitoring records for the period of the missing report which showed that you met your monitoring obligation. Please submit the missing report as soon as possible and ensure that future reports are submitted in a timely manner.

A review of the monitoring data for the period of the missing report revealed that Millat violated its daily maximum and monthly average zinc limits in November with a result of 4,430 ug/l on November 20th. You indicated that this violation was associated with the dumping and cleaning of the paint line tanks.

On March 8, 2011 you had the contents of each of the seven stages sampled to determine the source(s) of zinc. Stage 1 (alkaline cleaner) was revealed to have 10,000 ug/l zinc with the next highest concentration being 818 ug/l in Stage 6 which is an RO rinse following the non-chrome sealer stage. The overflow from Stage 6 goes to Stage 4 (phosphate rinse).

You indicated that Stage 1 is planned to be dumped in early July as part of the next dumping and cleaning of all the paint prep line tanks. You also planned to sample and analyze the contents of Stage 1 to see how much change has occurred since the analysis in early March; I would expect the concentration to only be higher. I suggested that you also analyze the contents of the tank when it is fresh.

It is my contention that the discharge from Stage 1 causes you to violate your discharge limits and is, therefore, unacceptable. You will need to make arrangements to have the contents of Stage 1 hauled off-site for proper disposal. Your indirect discharge permit is in the process of being renewed and we plan to include language that specifically states that the contents of Stage 1 are not authorized for discharge. Please provide a response indicating your plan for handling the contents of Stage 1. If you object to the proposed permit language prohibiting Stage 1 from being discharged, please provide an explanation for why the discharge should be authorized.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

Finally, I continue to be troubled by the information I have gathered regarding how Millat collects samples. It is important that, with each sampling event, you document the following on the chain of custody sheet:

- the aliquot volume;
- the frequency of aliquot collection; and
- the final composite sample volume.

To illustrate my concern, the chain of custody form for the sampling event conducted on November 19-20, 2011 listed the final composite sample volume as being 17 liters (4.5 gallons). Aside from being an extremely large sample volume, it is much more than what should be collected from the discharge that is active for less than ten hours per day (the phosphate line is not operated during the full 10-hour work day) when the sampler is programed to collect 120 ml every 20 minutes. I would instead expect to the maximum composite volume to be 3.6 liters (120 ml x 20 min/60 min/hour x 10 hours = 3.6 liters). It is necessary for you to investigate how sampling is programmed and performed and explain how such large sample volumes can be collected.

Please provide a written response to this letter by July 8, 2011. If you have any questions concerning this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,

Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURES

CC: Ryan Laake - Ohio EPA / Central Office / DSW
Richard Robertson, CHMM – Robertson Environmental
Chuck Bauer – Clark County Department of Utilities

Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER	PERMIT APPLICATION NUMBER	DATE CONDUCTED
*1DP00050*AP*	*OHP000218*	*June 7, 2011*

INSPECTION TYPE	INSPECTOR	FACILITY TYPE	TIME IN	TIME OUT
I	*S*	*2*	*1250*	*1400*

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

Millat Industries Corp. - MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424

POTW RECEIVING DISCHARGE

Clark County - Southwest Regional WWTP

MAILING ADDRESS OF FACILITY

Millat Industries Corp. - MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424

CONTACT (NAME/TITLE/PHONE)

Mr. Tom Meyers / Maintenance Manager / (937) 535-1500 ext. 101
tmyers@millatindustries.com

FACILITY EVALUATION (See Inspection letter for complete descriptions)

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

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

Name and Signature of Inspector(s)	Agency / Office / Telephone	Date
Matt Walbridge	*Ohio EPA / Southwest District Office / (937) 285-6095*	6-9-11
Signature of Reviewer	*Ohio EPA / Southwest District Office / (937) 285-6034*	Date 6/9/11

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***Millat Industries Corporation - MPP Division*** Date of inspection: ***June 7, 2011***

Permit Application Number: ***OHP000218*** IDP Number: ***1DP00050*AP***

Facility Representative: ***Tom Meyers*** Inspector(s): ***Matt Walbridge***

COMPLIANCE

1. Date of last pretreatment inspection: ***April 6, 2010***

2. Has the facility been in compliance with its permit limits since the last inspection? ~~Y~~ / N
   If no, explain:
   Violated the daily maximum zinc limit on November 20, 2010 and monthly average zinc limit for November 2010.

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:
   Have not submitted a report for the period of July through December 2010. Monitoring data is available.

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

   Final composite sample volume of 17 liters (4.5 gallons) does not make sense if the facility operates for 10 hours max (with the phosphate line only operating part of that time) and the sampler is programed to collect 120 ml every 20 minutes. 120 ml x 20 min/60 min/hour x 10 hours = 3.6 liters.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***~45***

6. Shifts/Day: ***1*** ***(although a few people are on another shift but there is no paint line work on that shift.)***

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

8. Hours/shift: ***10***
   (4-day work weeks with Fridays being for overtime. There has been more Friday work recently although the paint line is not normally run on Fridays)

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

10. General facility description and operations:

    Job shop metal finisher including parts cleaning, deburring, tumbling, welding, painting, silk screening, pad painting and powder coat painting.

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

Aluminum is the main metal they process – some steel

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

Still hoping for more business to come in as they are at about half capacity.

WASTEWATER TREATMENT

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

The system consists of simply a settling tank (including one serving the tumbling operations). During cleanings, the pH of the process wastewater tank dumps is adjusted in the trench that is adjacent to the process line. Solids are retained behind the trench screen and removed.

See attached diagrams

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? ***NA*** ~~Y~~ / ~~N~~

PTI Number: Date:

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

If batch, list the frequency and duration:

pH adjustment of the process tanks dumps occurs approximately once every six months now with business being back up. Contents of the stage dumps are allowed to commingle to minimize need for pH adjustment (essentially stages 1 and 3). The settling tanks receive the daily wastewater generated by the tumbling operations and the rinse tank overflows.

17. Who is responsible for operating the treatment system?

Tom Meyer

18. How often is the treatment system checked?

There are pH and conductivity meters on the process tanks that are checked regularly and daily titrations are conducted for maintenance of chemistry balance in the process tanks.

There is a lock-out on the sump pit to minimize the chance that the sump pit would discharge without the contents of the pit being checked.

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

A high water level alarm (audible/light) is in the trench pit adjacent to the phosphate line.

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

There is an ISO-type document maintained and controlled by Mr. Meyer.

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

(No parts associated with the system)

22. Are there any bypasses in the system? ~~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:

Hauled off-site.

Frequency and amount of disposal:

The settling tank serving the tumbler operations is cleaned out once per month into drums and the large underground settling tank is cleaned out once a year.

The process line tanks are cleaned out about once every six months (up from once a year now that business is back up) and contain some sediment. Cleanings are directed to the settling tank.

Name of hauler/landfill/disposal facility:

Mid-West Environmental

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. Alkaline Cleaner Tank		*1,400 gal dump every six months*	*1,400 gal dump every six months*	*NA*	*NA*
2. Alkaline Cleaning Rinse		*~1,440 gpd with 900 gal dump every six months*	*~2,000 gpd with 900 gal dump every six months*		
3. Iron Phosphate Tank		*1,050 gal dump every six months*	*1,050 gal dump every six months*		
4. Iron Phosphate Rinse		*~1,440 gpd with 1,050 gal dump every six months*	*~2,000 gpd with 900 gal dump every six months*		
5. Non-chrome Sealer Tank		*750 gal dump every six months*	*750 gal dump every six months*		
6. Sealer Rinse		*~1,440 gpd to iron phosphate rinse with 100 gal dump every six months*	*~2,000 gpd to iron phosphate rinse with 100 gal dump every six months*		
7. Tumbler		*~800 gpd*	*~800 gpd*		
8. ADF Washer		*~ 35 gpd*	*~ 35 gpd*		
Total Regulated Process Flow	*n...e ...rom settling tank*	*5,190 gpd*	*~7,000 gpd*		
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis		*1,840 gpd*	*(2)*		
Softener Regeneration					
Softener Backwash					
Filter Backwash					
Compressor Condensate					
Storm water					
Total of Dilute Flows		*2,000 gpd*	*~2,00...*		
Unregulated Flows		*NA*	*NA*		
Sanitary		*Not present at sampling point*	*Not present at sampling point*		
TOTAL FLOW	*cleanout downstream from settling tank*	*7,000 gpd*	*~9,000 gpd(1)*		

(1) Average flow for January 2009 through July 2010.

(2) Dilute flows from RO water system are reported to be approximately 20-25% of total flow (~3,000 gpd down to about 1,000 gpd now).

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

NA

SELF MONITORING

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

"Samples of the effluent from the settling tank shall be collected from the outside cleanout located at the southwest corner of [the] building."

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?

The meters on tumbler/washer line, paint line and total incoming water line can't be calibrated.

If estimated, describe method of estimation:

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:

Robertson Environmental LLC

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 ***(they collect time-proportional samples)***	~~Y /~~ N
Proper preservation techniques ***(the sample jars are 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 Labs

TOXICS MANAGEMENT

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

Small amount of toluene (5 gallons) is used as for thinning paint. It is kept in a designated storage area.

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? ***NA*** ~~Y~~/~~N~~

39. Identify any potential slug load or spill areas:

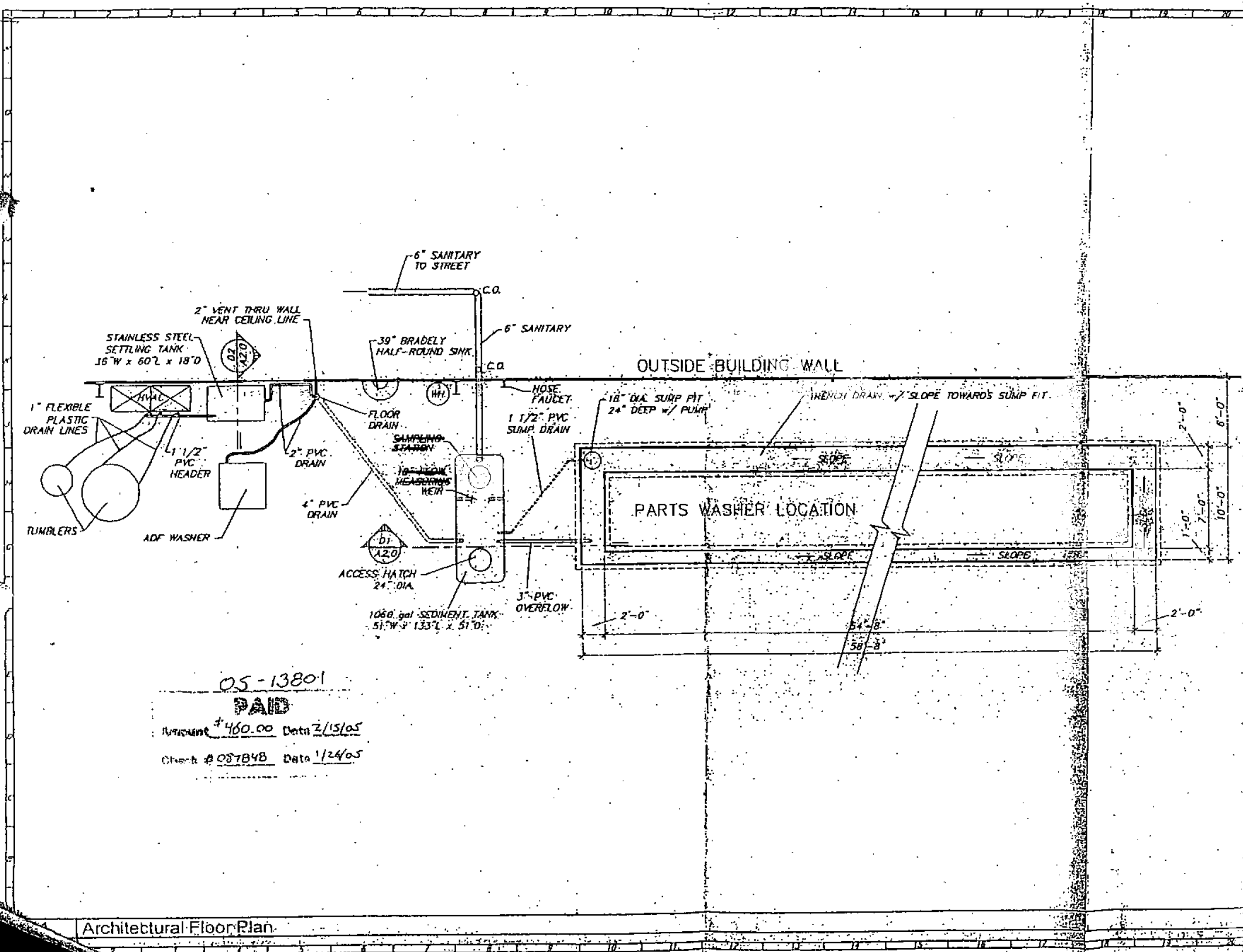
None identified during this inspection.

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

OBSERVATIONS

- ***A review of available monitoring data for the current reporting period (that will end in June) indicates no violations.***
- ***Composite sample volume has been recorded as being 17 liters (4.5 gallons). At 120 ml every 20 minutes and a 10-hour work day (although the phosphate line doesn't run all day), they should only be collecting about 3.6 liters (1 gallon).***
- ***Chain of custody sheets <u>continue</u> to need to have information for aliquot volume and frequency and the final composite sample volume.***
- ***For the November 2010 sampling event, the sample was held by the sample collector (Richard Robertson) for two days before being turned over to the lab. Tamper-evident tape may be a good practice to institute for samples not taken directly to the lab.***


6" SANITARY TO STREET
C.O.
2" VENT THRU WALL NEAR CEILING LINE
6" SANITARY
STAINLESS STEEL SETTLING TANK 16"W x 60"L x 18"D
39" BRADELY HALF-ROUND SINK
C.O.
OUTSIDE BUILDING WALL
HVAC
HOSE FAUCET
1" FLEXIBLE PLASTIC DRAIN LINES
FLOOR DRAIN
18" DIA. SUMP PIT 24" DEEP w/ PUMP
TRENCH DRAIN w/ SLOPE TOWARDS SUMP PIT
1 1/2" PVC SUMP DRAIN
1 1/2" PVC HEADER
2" PVC DRAIN
SAMPLING STATION
MEASURING WEIR
SLOPE
PARTS WASHER LOCATION
TUMBLERS
4" PVC DRAIN
ADF WASHER
D1 A2.0
ACCESS HATCH 24" DIA.
3" PVC OVERFLOW
1060 gal SEDIMENT TANK 51"W x 133"L x 51"D
2'-0"
6'-0"
10'-0"
7'-0"
1'-0"
54'-8"
58'-8"
Architectural Floor Plan

05-13801

PAID

Amount $460.00 Date 2/15/05

Check # 057848 Date 1/24/05

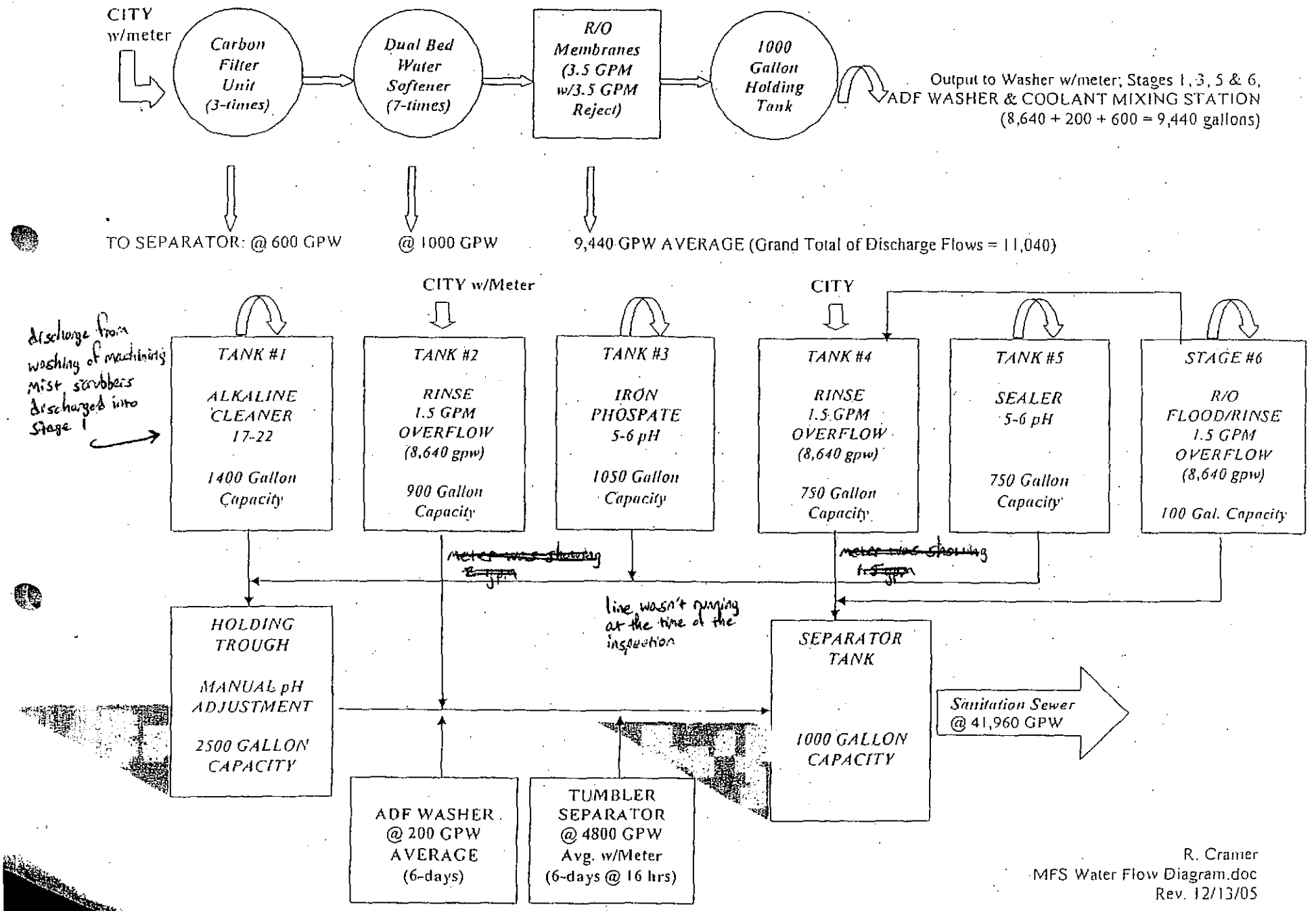
NORTON
ENGINEERING, LLC

Floor Plan

Permit Documents

Miller Industries
Parts Washer Trench and Septic Tank
Centerpoint Drive
Huber Heights
State of Ohio

A1.0



R. Cramer
MFS Water Flow Diagram.doc
Rev. 12/13/05