



State of Ohio Environmental Protection Agency

Southwest District Office

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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 16, 2008

RE: Pretreatment Compliance Inspection and
Notice of Violation

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

Dear Mr. Myers:

On June 16, 2008 I met with you to conduct a pretreatment compliance inspection of your facility's operations. I appreciate you accommodating me on short notice. A review of your self-monitoring reports since my previous inspection revealed the following violations:

- Failure to submit a monitoring results for December 2007 (due January 20, 2008);
- Failure to properly report dilute flow during the period of June through November 2007; and
- Failure to conduct or otherwise document that at least one sampling event during each six-month reporting period occurred when wastewater associated with emptying and cleaning the phosphate line was being discharged.

Please note that your indirect discharge permit calls for you to report monitoring results for the period of January through June by July 20th and July through December by January 20th. It is necessary for you to submit a report for December 2007 as soon as possible. It is also necessary for you to explain the peculiar dilute flow values (e.g.: 3.53 gpd) reported for June through November 2007. If the reported flow values are erroneous it will be necessary for you to amend the self-monitoring report.

In my previous inspection, I asked you to ensure that the date and time sampling started and stopped along with the frequency and volume of aliquots programmed into the auto-sampler be recorded on the chain of custody sheets generated for each sampling event. I continue to find this information to be significant deficiency of your monitoring efforts and ask that you explain how you will ensure it is provided in the future.

Ohio EPA is switching to its new electronic discharge monitoring reporting (e-DMR) system and since you have the capability (Internet access) it will be necessary for you to submit a memorandum of agreement to obtain a personal identification number (PIN) to allow you to report using the new

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system. The e-DMR system is very user-friendly and allows for multiple data entry sessions, editing and narrative comments (such as which data points are associated with tank cleanings) prior to submitting a final report. Submitted reports can also be amended. Please inform me when you plan to be registered with the e-DMR system.

Please provide a written response that addresses the findings from my inspection. 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: Julia Zhang - Ohio EPA / Central Office / DSW
Richard Robertson, CHMM - Robertson Environmental



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER
1DP00050*AP

PERMIT APPLICATION NUMBER
OHP000218

DATE CONDUCTED
June 16, 2008

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1115

TIME OUT
1215

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 more complete description)

(S = Satisfactory, M = Marginal, U = Unsatisfactory)

M	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 7-16-08
Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date 7/16/08

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Millat Industries Corporation - MPP Division*

Date of inspection: *June 16, 2008*

Permit Application Number: *OHP000218*

IDP Number: *1DP00050*AP*

Facility Representative: *Tom Meyers*

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) (<i>December 2007 monitoring data is missing</i>) | 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 permit requires at least one sample during each six-month reporting period to be collected during times when wastewater from process tanks dumps are present.

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

Required dilute flows were lacking – now they are unusual (i.e.: 3.9, 4.38 gpd)

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *~60*
6. Shifts/Day: *2*
skeletal crew (5 or 6) on 2nd shift. No paint line operation
7. Production Days/Year: *250*
(5-day work weeks with some Saturdays)
8. Hours/shift: *8 to 10*
9. Any production changes since the last inspection?
If yes, explain: Y / N

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.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

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

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.

(They are on a six-month cleaning cycle for the paint prep line – done around the first of June and in December. Cleaning takes between 6 to 24 hours)

- 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. Contents of the stage dumps are allowed to commingle to minimize need for pH adjustment. 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.

WASTEWATER TREATMENT CONTINUED

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-required document maintained on the company's network.

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 once every six months and contain about 1/3 inch of sediment. Cleanings are directed to the settling tank. except solids.

Approximately 1,200 gallons of sludge/water is removed

Name of hauler/landfill/disposal facility:

Perma-Fix

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	ND	NA	NA
2. Alkaline Cleaning Rinse		~1,440 gpd with 900 gal dump every six months	ND		
3. Iron Phosphate Tank		1,050 gal dump every six months	ND		
4. Iron Phosphate Rinse		~1,440 gpd with 1,050 gal dump every six months	ND		
5. Non-chrome Sealer Tank		750 gal dump every six months	ND		
6. Sealer Rinse		1,440 gpd to iron phosphate rinse with 100 gal dump every six months	ND		
7. Tumbler		~800 gpd	ND		
8. ADF Washer		~ 35 gpd	ND		
Total Regulated Process Flow		5,160 gpd	~5,000 gpd		
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis					
Softener Regeneration		1,840 gpd	(2)		
Softener Backwash					
Filter Backwash					
Compressor Condensate					
Storm water					
Total of Dilute Flows		1,840 gpd	(2)		
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	~5,000 gpd(1)		

(1) In March, April and May 2007, reported flows were ~18,000 gpd but have since averaged less than 5,000 gpd.

(2) From January to May 2007, they failed to report dilute flow. Since then they have reported unusual flows around 4 gpd.

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? Y / ~~N~~
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? NA 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

Need to properly measure and report dilute flows.

Chain of custody sheets need to be completed with information such as sample date, sample start and stop times, aliquot volume and frequency.

The 4519 report needs to indicate which samples represent wastewater from tank dumps.



