



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 19, 2007

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

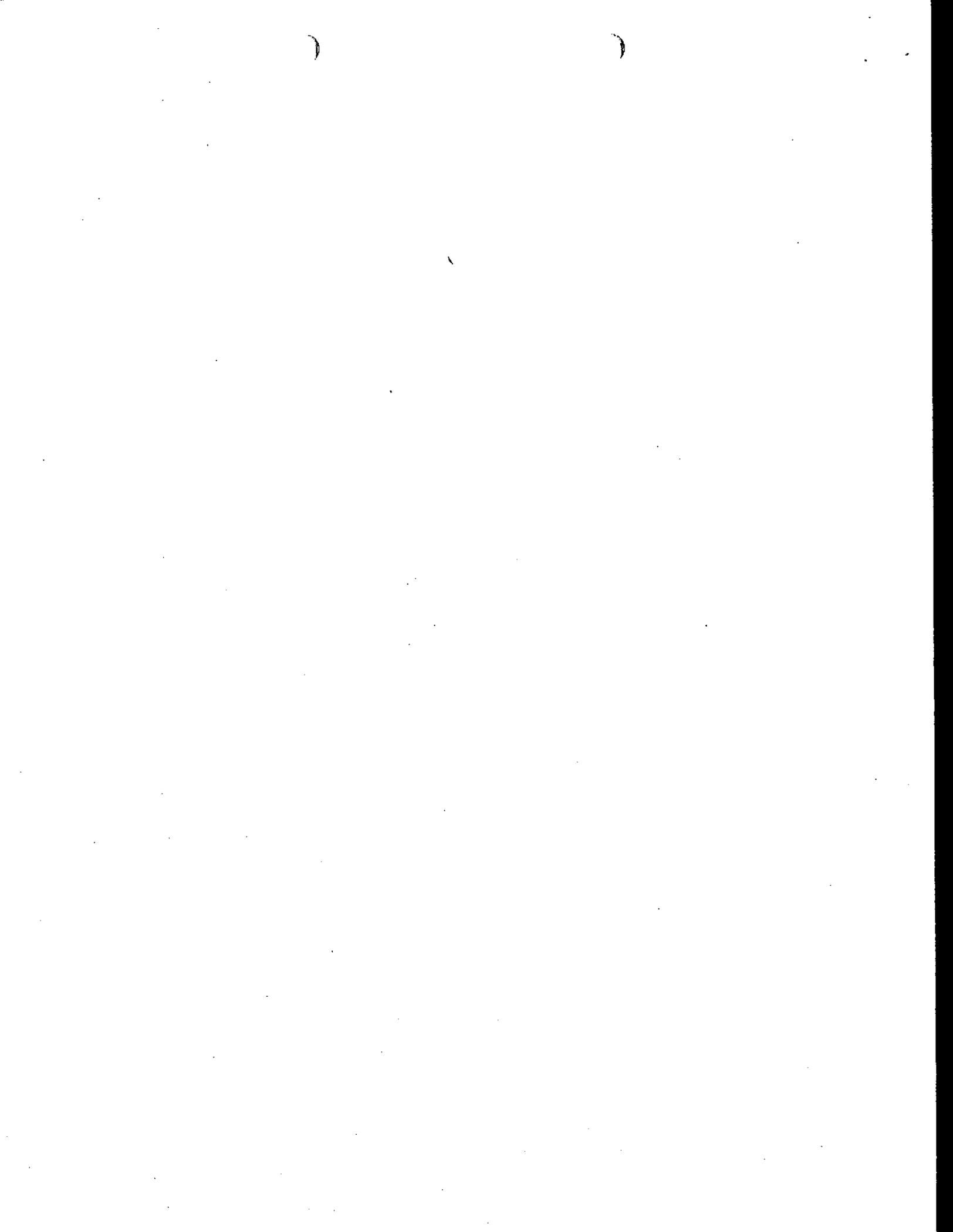
Mr. Tom Myers
Millat Industries Corp.
MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424

Dear Mr. Myers:

On June 26, 2007 I met with you to conduct a pretreatment compliance inspection of your facility's operations. A review of your self-monitoring reports since my previous inspection revealed the following violations:

- Failure to submit a monitoring report for the period of July through December 2006;
- Failure to report monitoring results for lead during the months of February and May 2007
- Failure to report cyanide during the reporting period of January through June 2007;
- Failure to report dilute flow during the period of January through June 2007;
- Failure to provide the necessary monitoring or alternate certification statement and requisite report coding for total toxic organics during reporting period of January through June 2007;
- It appears that you have provided an incomplete report for the period of January through June 2007. Your permit directs you to report results for the period by July 20th but your report was for only five months ending in May;
- Finally, a check of the monitoring result for Nickel on May 18, 2006 revealed that the result was reported as 0.0843 milligrams per liter when it should have been reported as 84.3 micrograms per liter.

It is imperative that you correct all past reporting errors where possible (including any necessary submittals) and ensure that all monitoring and reporting obligations are satisfied in the future. Please provide a written response addressing each of the above items and explain how you plan to remedy the problem so that they do not recur. This response is due by August 13, 2007.



There are three other findings from my inspection that necessitate your attention and they are as follows:

1. In Millat's August 9, 2006 response to my inspection letter, dilute flows were said to be based on multiplying the average daily flow by 0.24 "as stated in the permit". The permit does not direct flows to be reported based on a calculation. Instead, Millat is expected to make a reasonable attempt to measure or estimate the actual volume of dilute flow discharged
2. I continue to ask that the chain of custody sheets generated with each monitoring event include notations on how the automatic sampler was programmed to operate (i.e.: 100 ml aliquots collected every 20 minutes). Additionally, the total volume of the final composite sample should be noted so that a comparison can be made between expected and actual volumes.
3. Reported flows since January 2007 show a dramatic increase from about 5,000 gpd in January and February to about 18,000 gpd in March, April and May. Please provide an explanation of why flows have increased.

In your response due by August 13, 2007, please address these three items.

Finally, I encourage you to work toward submittal of self-monitoring reports via our SWIMware system. Please note that a Personal Identification Number associated with reporting with SWIMware is as unique and legal as a person's signature. If you pursue reporting using SWIMware, it will be necessary to complete and submit a Memorandum of Agreement. Let me know if you have any questions about this process.

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

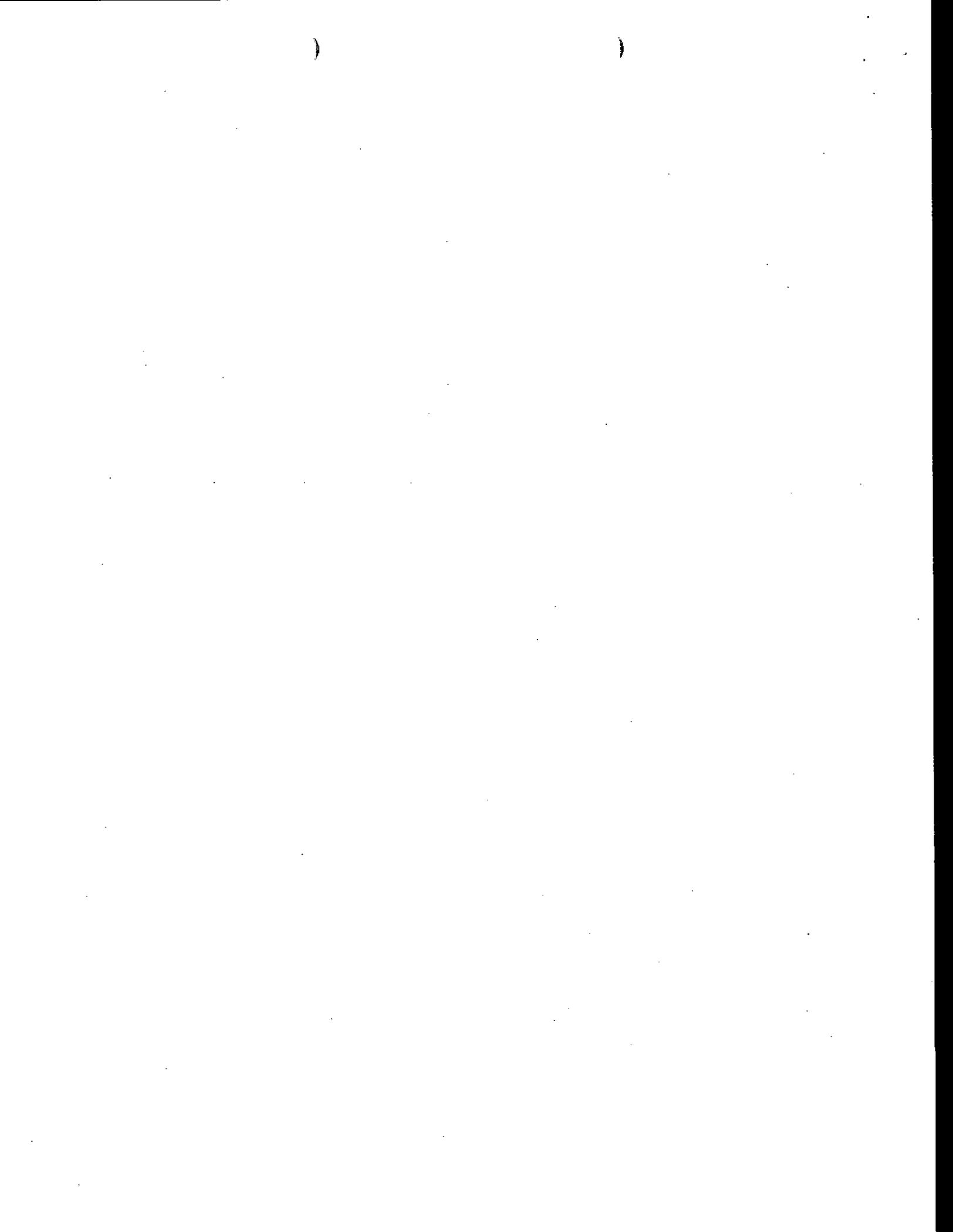
Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURES

CC: Julia Zhang, PE - Ohio EPA / Central Office / DSW
David G. Leist - Clark County Department of Utilities
Richard Robertson, CHMM - Robertson Environmental





PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

PERMIT NUMBER 1DP00050*AP	PERMIT APPLICATION NUMBER OHP000218	DATE CONDUCTED June 26, 2007
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2
		TIME IN 1445
		TIME OUT 1610

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
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MAILING ADDRESS OF FACILITY
**Millat Industries Corp. - MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424**

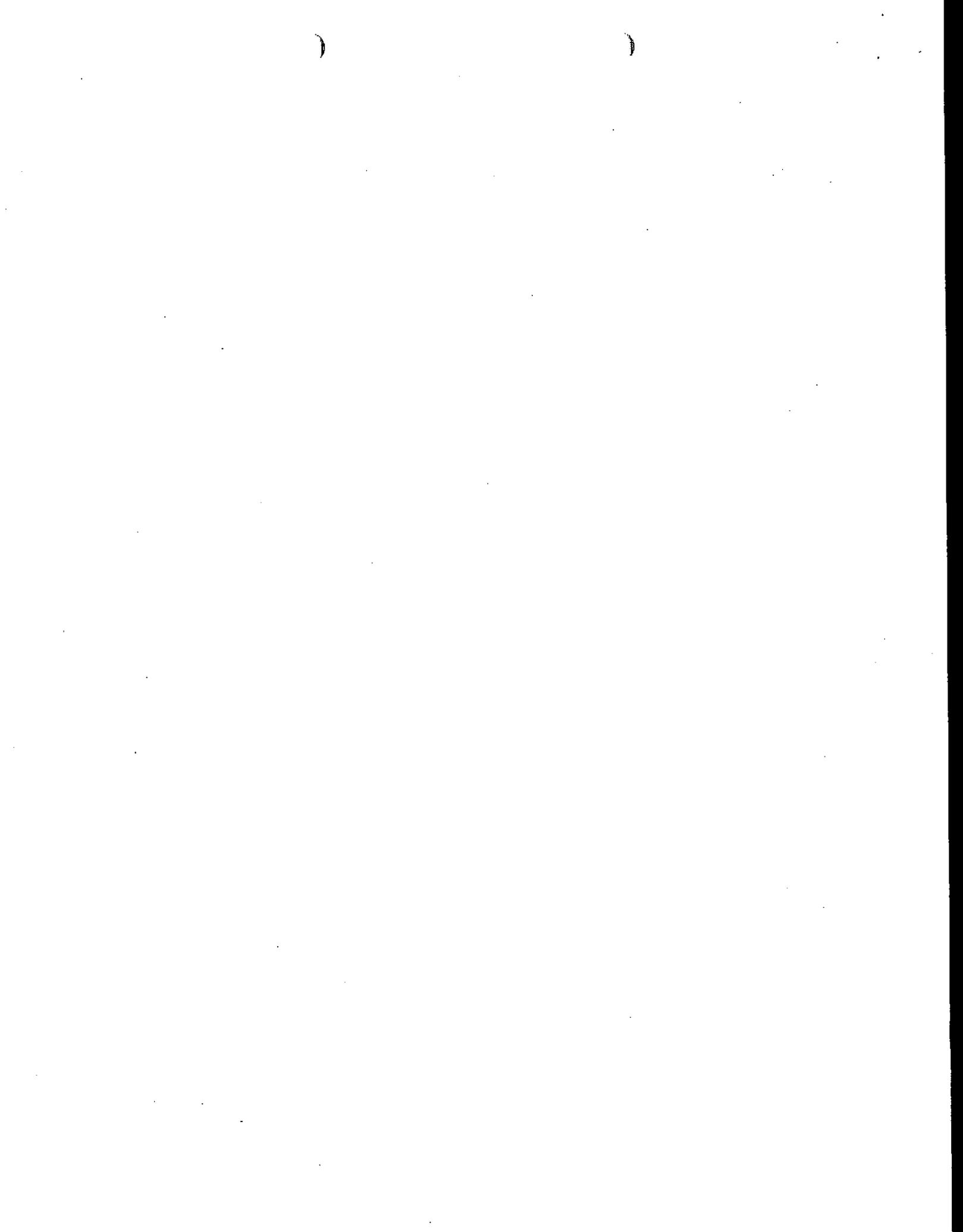
CONTACT (NAME/TITLE/PHONE)
**Mr. Tom Meyers / Maintenance Manager / (937) 535-1500 ext. 101
tmyers@millatindustries.com**

FACILITY EVALUATION (See Inspection letter for more complete description)

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

M	Sampling Procedures	NA	Compliance schedule requirements
U	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 7-20-07
Signature of Reviewer Matt G. Swick	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 7/20/07



INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Millat Industries Corporation - MPP Division**

Date of inspection: **June 26, 2007**

Permit Application Number: **OHP000218**

IDP Number: **1DP00050*AP**

Facility Representative: **Tom Meyers**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **June 29, 2006**
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 (<i>although samples need to be iced during collection and transport</i>) | 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:

**Failed to conduct monthly monitoring for lead in February and May 2007.
Have failed to conduct monthly monitoring for dilute flow (and instead reported pH for which monitoring is not required.)**

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

(this is the first inspection)

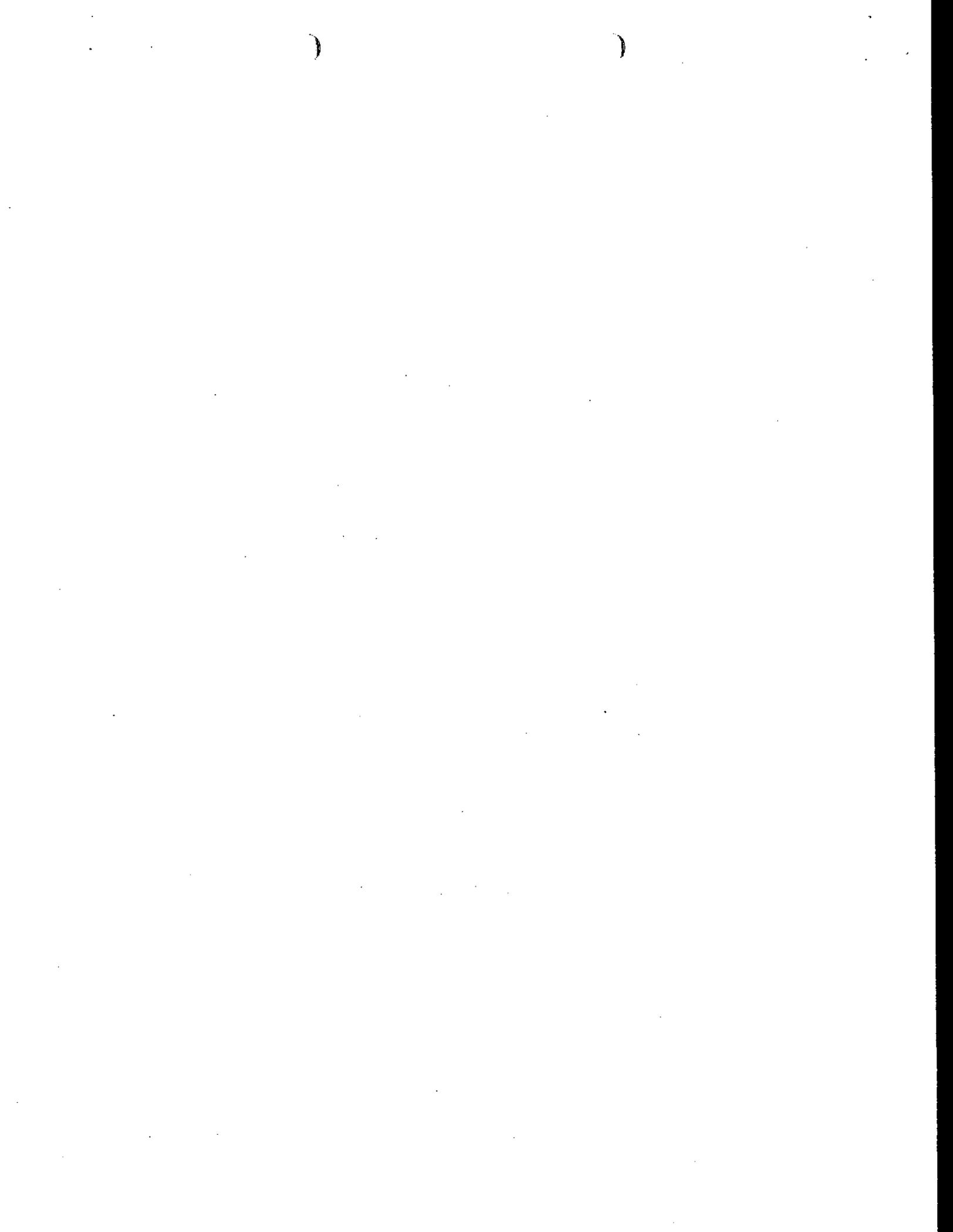
FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~60**
6. Shifts/Day: **2** (*sketch crew on 2nd 5-6) no paint line.*)
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~~

Added welding (with cooling provided by a chiller)

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.

*review then
of service
requirements*

(They are on a six-month cleaning cycle for the paint prep line - done in June and December)

-15'

6-24 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.

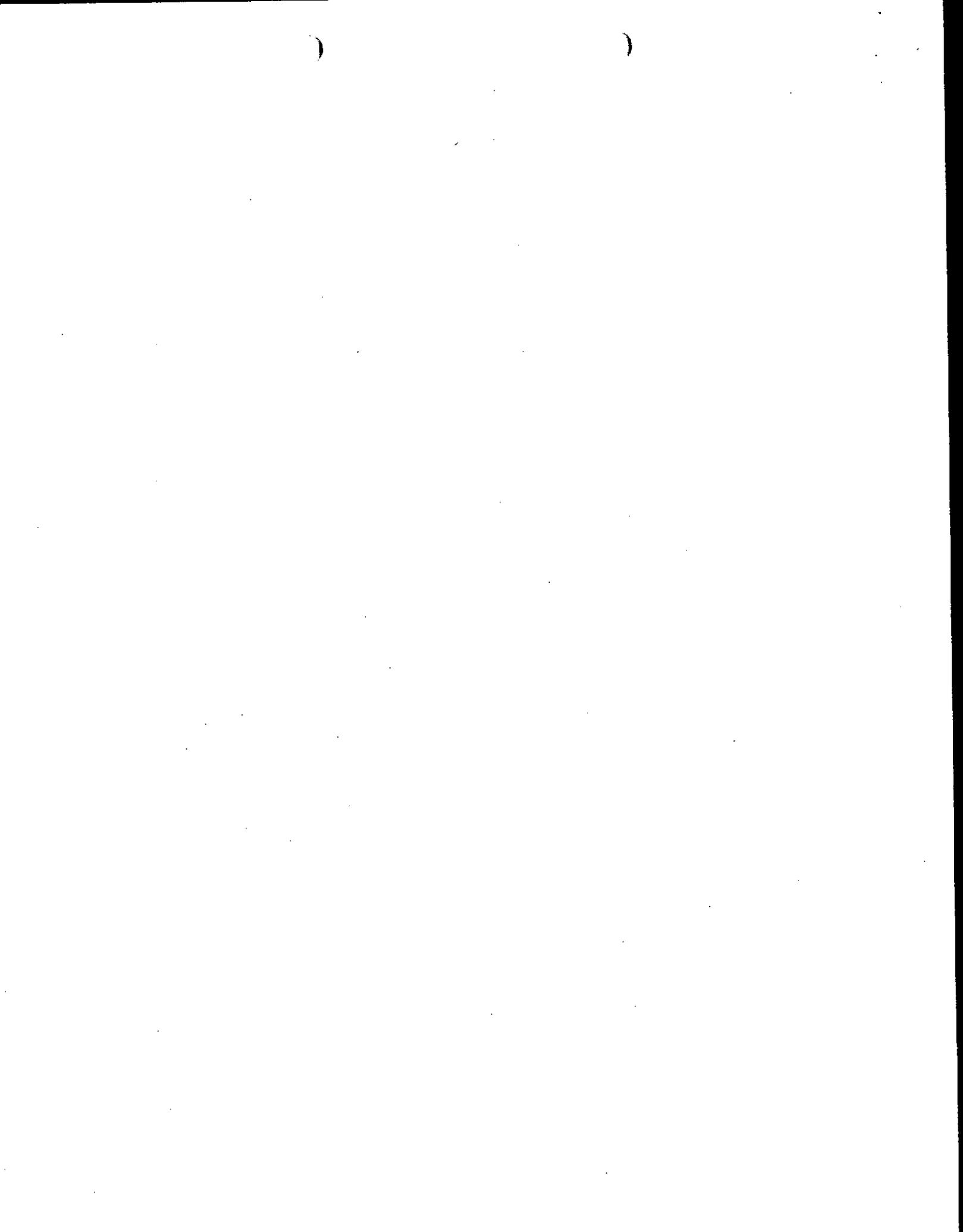
17. Who is responsible for operating the treatment system?

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: *6 mo. - 1 year*

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 ("whether it needs it or not").

The process line tanks are cleaned out once every six months and contain about 1/3 inch of sediment. to settling tank

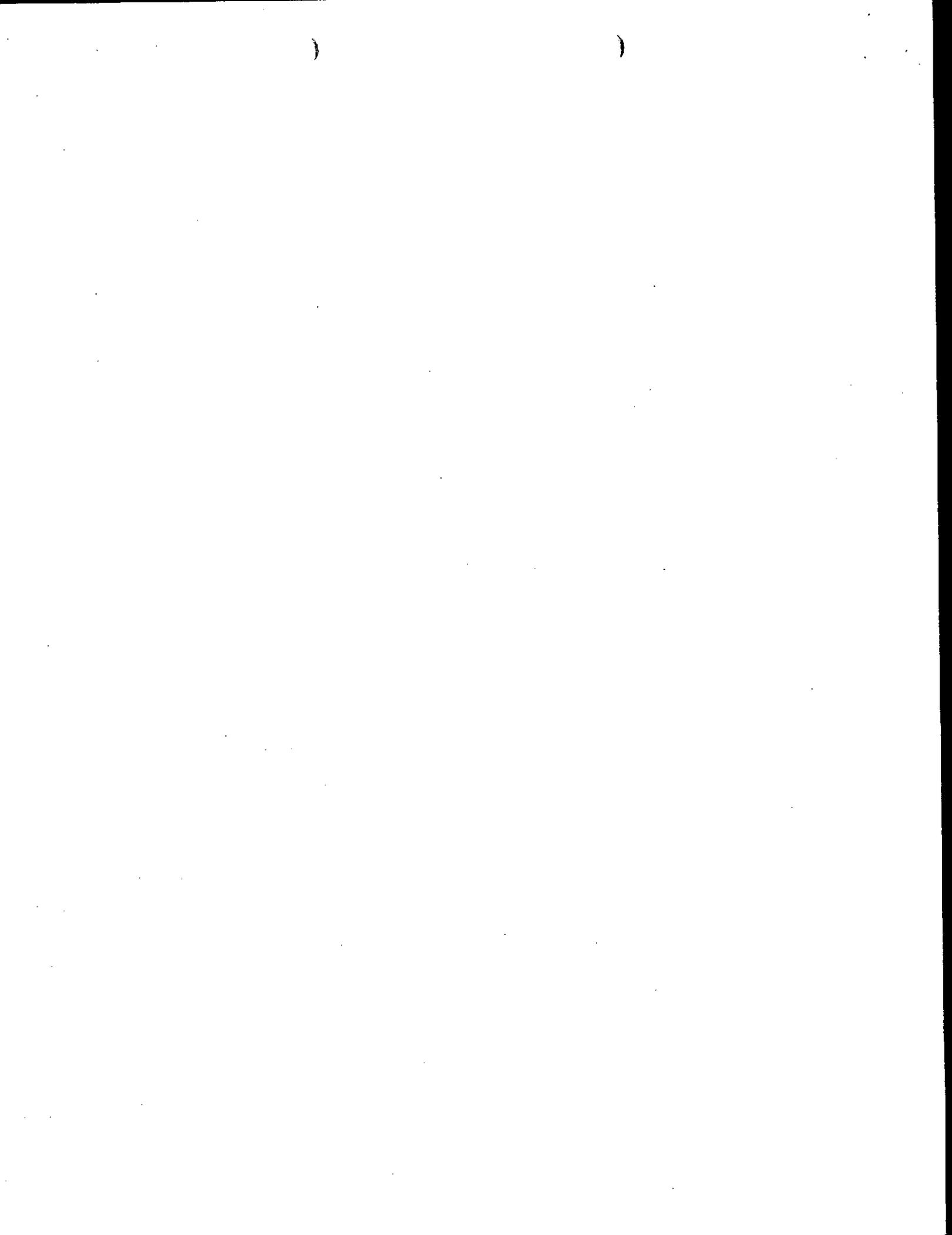
Approximately 1,200 gallons of sludge/water is removed

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



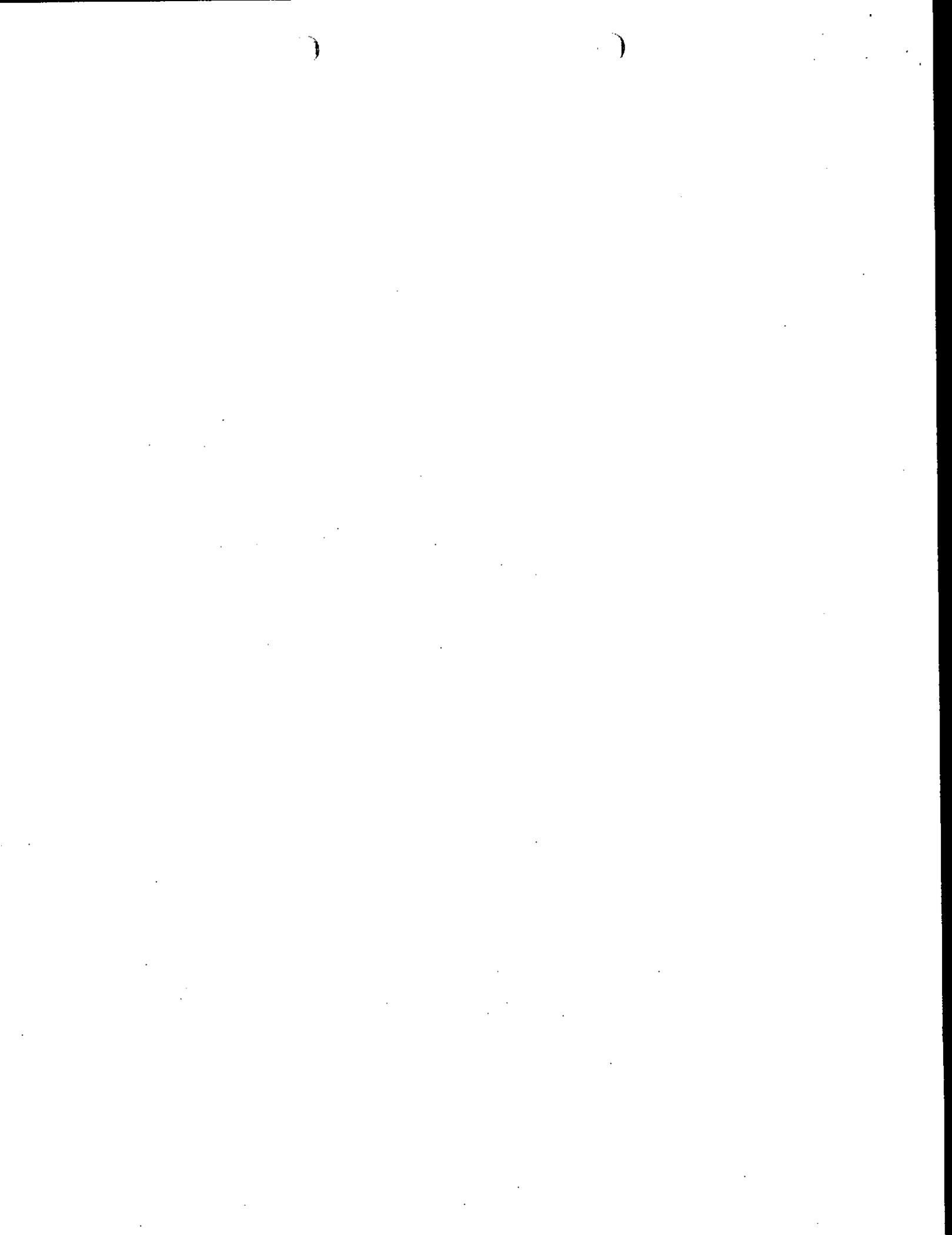
PROCESS AND WASTEWATER INFORMATION

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	~9,000 gpd (based on self-monitoring)(1)	(1) beginning in March 2007, reported flows have gone from ~5,000 gpd up to ~18,000 gpd. (2) Beginning in January 2007, they stopped reporting dilution flow.	
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis					
Softener Regeneration		1,840 gpd	~1,150 gpd (based on old self-monitoring reports)(2)		
Softener Backwash					
Filter Backwash					
Compressor Condensate					
Storm water					
Total of Dilute Flows		1,840 gpd	~1,150 gpd based on self-monitoring)(2)		
Unregulated Flows		NA	NA		
Sanitary		Not present	Not present		
TOTAL FLOW	cleanout downstream from settling tank	7,000 gpd	~9,000 gpd (based on self-monitoring)(1)		

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:

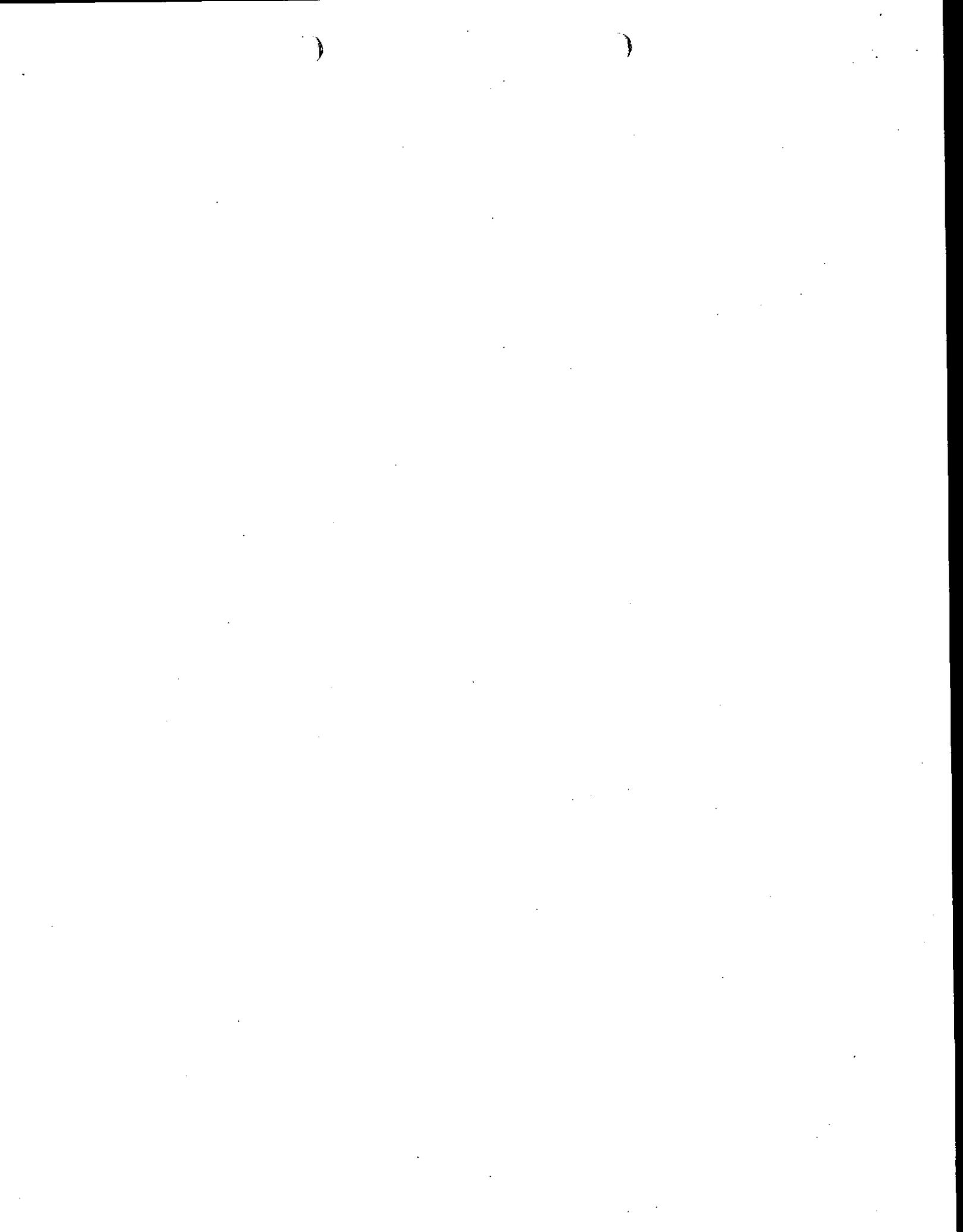
Robertson Environmental LLC

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 but are not iced)* 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.

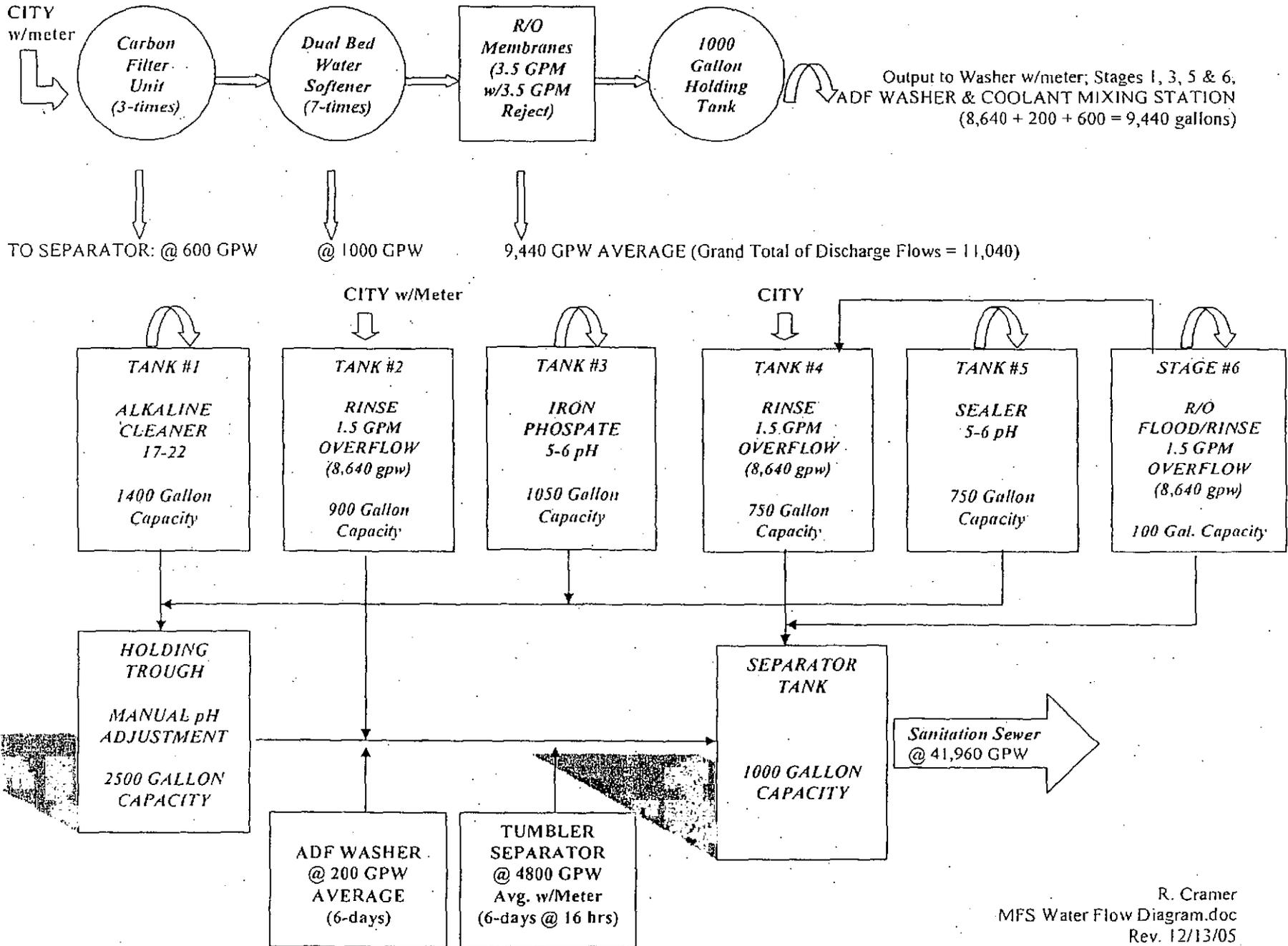
OBSERVATIONS

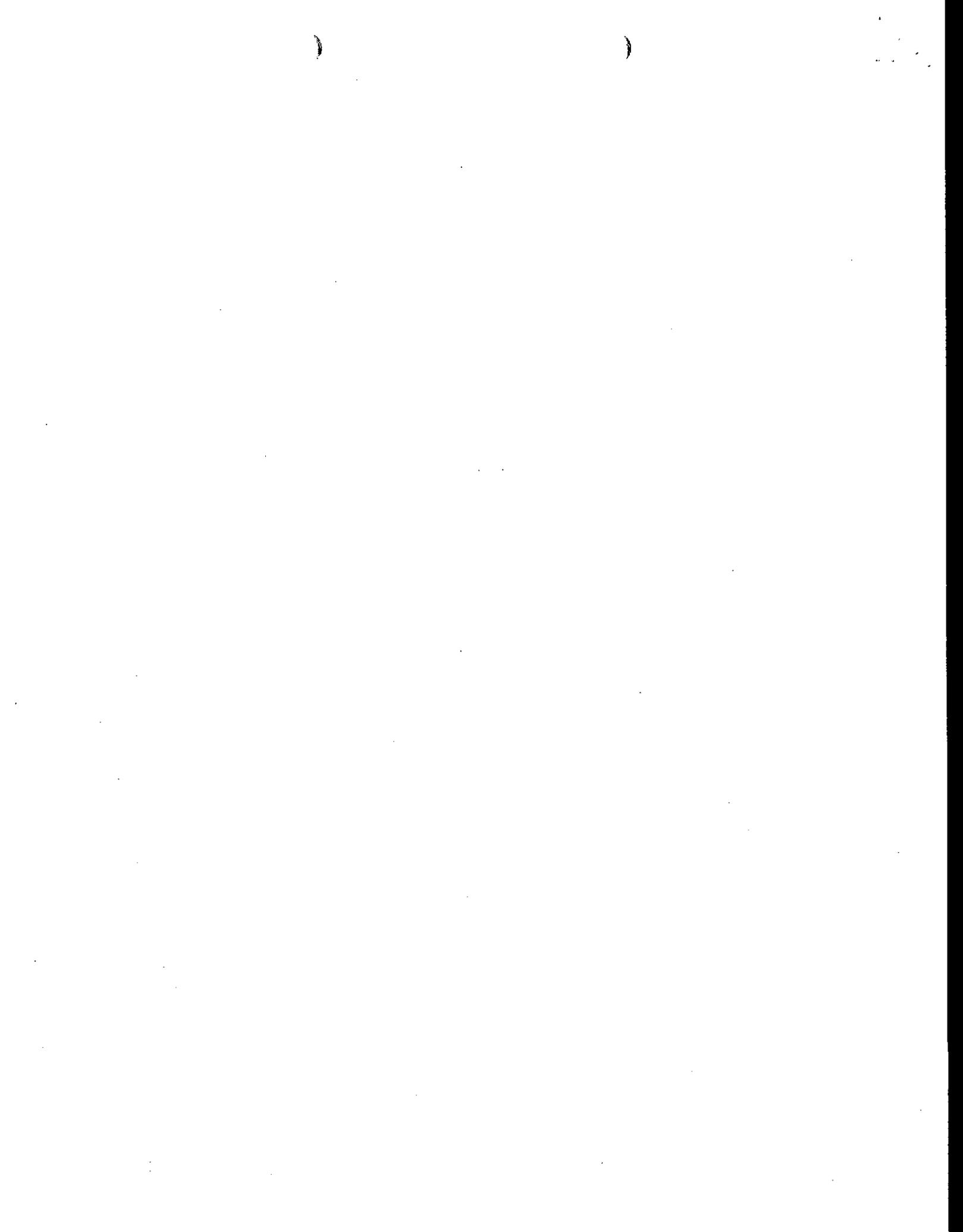
Need to measure and report dilute flows.

Need to send copy of self-monitoring reports to district office.

Flow could not be viewed at sampling point but was able to be viewed at downstream clean-out.







**NORTON
ENGINEERING, LLC**

ENGINEERING A BETTER WORLD
14 EDDY FIRST STREET
DAYTON, OHIO 45408
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FAX: 513-253-5871
joe@nortoneng.com
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Floor Plan

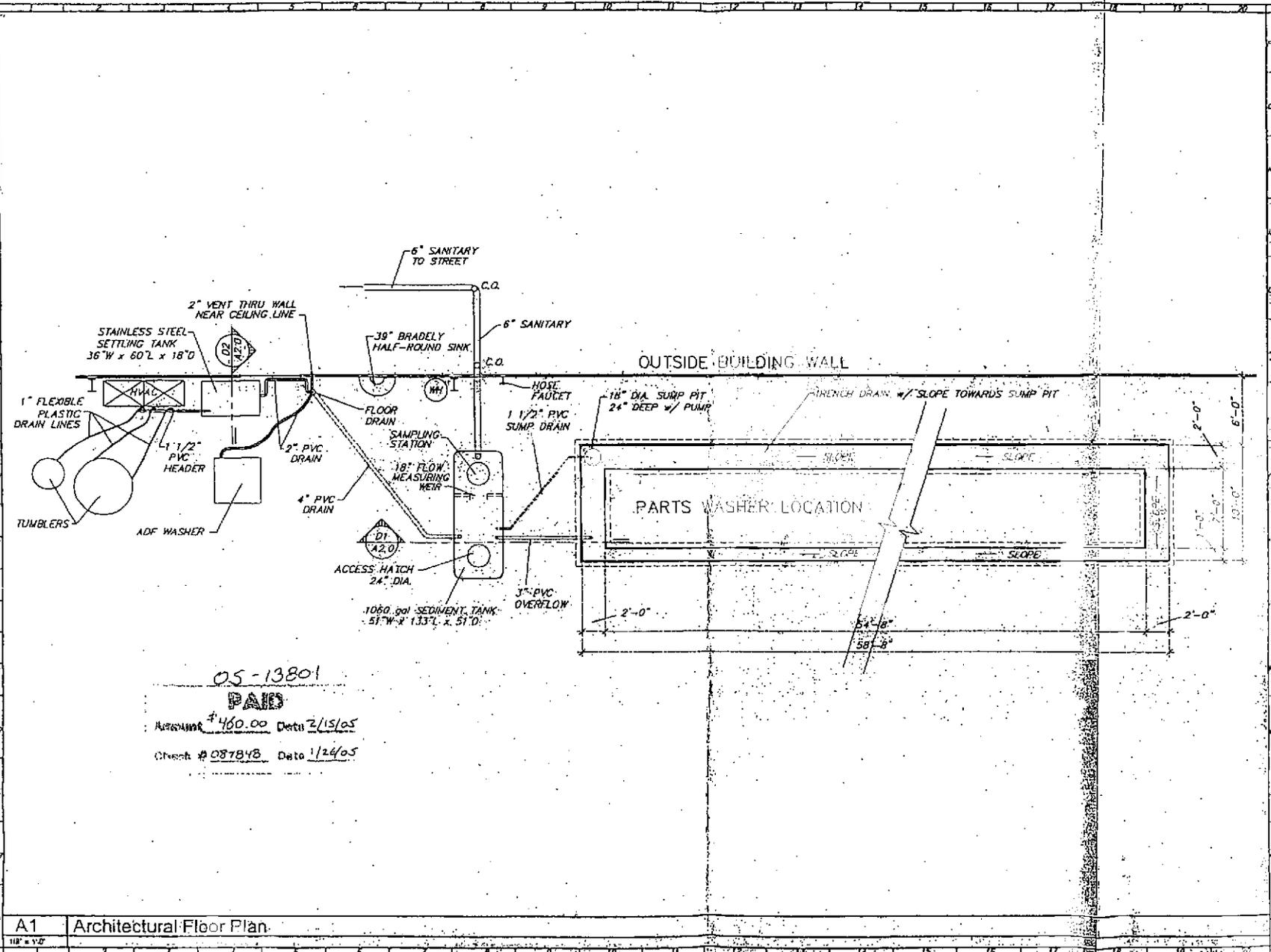
Permit Documents

John Norton

Water Industries
Parts Washer Trench and Septic Tank
Center Point Drive
Huber Heights
State of Ohio

DATE	DATE
BY	BY
CHK	CHK
APP	APP
DATE	DATE

100-1111-1111
MAY 05
A1.0



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Account #460.00 Date 2/15/05
Check #087818 Date 1/24/05

