



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korteski, Director

June 3, 2010

RE: Wastewater Pretreatment Inspection and
Notice of Violation

Mr. Chris Ford
ADVICS Manufacturing Ohio, Inc.
1650 Kingsview Dr.
Lebanon, OH 45036

Dear Mr. Ford:

On May 20th I met with you to conduct a pretreatment compliance inspection. A review of your discharge monitoring reports since my previous inspection revealed a violation of your monthly average chromium limit of 1,710 ug/l in June 2009 when you reported 1,960 ug/l on June 22nd. Chromium had been running high in previous months.

You attributed the violation, and the other high but compliant chromium values, on a customer having appearance requirements that necessitated you perform more frequent blowdowns and tank dumps to avoid the build-up of iron in the process tanks that caused the appearance problems. These more frequent dumps of chromate solutions apparently overloaded the pretreatment system while at the same time causing filter press sludge to become a hazardous waste.

In October 2009 you switched to a new chromate solution that did not cause appearance issues, thereby eliminating the need for frequent tank dumps and subsequently reducing the loading on the pretreatment system. Recent effluent monitoring results show much lower chromium concentrations and filter press sludge has apparently returned to being non-hazardous.

I would like for you to develop a strategy that better ensures the operation of the pretreatment system will adapt to potential high metals loadings. It may be that pH and ORP set points need to be adjusted to ensure both zinc and chromium are better targeted for precipitation or that the procedures for in-house testing done ahead of batch treatment are refined. Please provide a response to this issue explaining how the pretreatment system and its operation will ensure compliant discharges should high metals loading occur in the future.

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Line 2 is to be rebuilt and re-tooled this summer. Line 3 will be brought on-line during this period. The new Line 2 will have several enhancements over the old one such as a running rinse tank replacing a dead rinse tank. Please provide an updated diagram for this new line that reflects the new tank layout, tank volumes, wastewater sources and destinations, tank dump frequencies and flow rates.

Finally, I noted that one of the two pH buffer solutions used to calibrate the pH meters for both the pretreatment system and for compliance monitoring was expired. It is necessary to ensure buffer solutions, and any other chemicals, are not used if they are expired. I suggest that dates about two weeks prior to the expiration dates of any chemicals you use be entered in your PC's calendar to automatically remind you of the need to order fresh solutions. Let me know how you decide to address this issue.

Please provide a written response to this letter by June 21st. If you have any questions concerning this letter or inspection form, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge
Division of Surface Water

ENCLOSURE

CC: Ryan Laake – Ohio EPA, Central Office, DSW
John Habig – City of Lebanon



Environmental
Protection Agency

PRETREATMENT INSPECTION REPORT

Southwest District Office

PERMIT NUMBER
1DP00045*BP

POTW FACILITY NUMBER
OH0021509

DATE CONDUCTED
May 20, 2010

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1020

TIME OUT
1215

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**ADVICS Manufacturing Ohio, Inc.
1650 Kingsview Drive
Lebanon, OH 45036**

POTW RECEIVING DISCHARGE

City of Lebanon WWTP

MAILING ADDRESS OF FACILITY

**ADVICS Manufacturing Ohio, Inc.
1650 Kingsview Drive
Lebanon, OH 45036**

CONTACT (NAME/TITLE/PHONE/e-MAIL)

Mr. Chris Ford / Senior Manufacturing Engineer / (513) 932-7878 ext. 239 / CFord@advics-ohio.com

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
S	Reporting	S	Notification
M	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 6-3-10
Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date 6/4/10

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **ADVICS Mfg.**

Date of inspection: **May 20, 2010**

OH Number of Receiving POTW: **OH0021509**

IDP Number: **1DP00045*BP**

Facility Representative: **Mr. Chris Ford**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **June 4, 2009**
2. Has the facility been in compliance with its permit limits since the last inspection? Y/N
If no, explain:

**Violated the monthly average limit for Chromium in June 2009 (limit = 1,710 ug/l; reported 1,960 ug/l)
Mr. Ford showed me the monitoring data to be reported in July for the current reporting period and
all data was compliant.**
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:
4. Was the facility required to perform any actions as a result of the last inspection? Y/N
Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~550**
6. Shifts/Day: **3 (currently over a 20-hour workday)**
7. Production Days/Year: **~244**
8. Hours/shift: **8**
Some areas are at 12-hour shifts and other areas have two shifts with a preventative maintenance shift in-between.
9. Any production changes since the last inspection? Y/N
If yes, explain:

Except for 'Eco-chrome' no longer being used in the chromating process, bath chemistries are all unchanged.

Anodize line has been moth-balled since June 2006.

Production levels dropped when the economy slowed in 2009.
10. General facility description and operations:

Manufacture automotive brake assemblies. Operations include:

Cleaning
Washing
Zinc electroplating with chromating
Machining
Assembly

WASTEWATER TREATMENT CONTINUED

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

Level alarms on primary storage and treatment tanks, and decant and filter feed tanks.

PLC requires complete stage treatment cycles before the contents of tanks are allowed to be transferred.

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

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

pH and ORP probes along with spare mixer gears.

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? N.A. Y/N

23. Are residuals or sludges generated? Y/N

Method of disposal:

Sludge hopper is emptied into a roll-off daily.

Frequency and amount of disposal:

The filter press is typically emptied after running about two batches through it.

20 yd³ roll-off about every third Friday.

Name of hauler/landfill/disposal facility:

Environmental Enterprises if the primary hauler, Clean Harbors is the back-up hauler

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

In 2009 it became hazardous because of chromium. Since the elimination of 'Eco-Chrome' in October 2009, the sludge as returned to being non-hazardous – although they are still handling it as if it were hazardous. Sampling occurs 2 to 3 times a year to determine its status as hazardous waste.

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. Zinc Electroplate (includes alkaline wash w/ rinses and scrubber)		<i>not restricted</i>	~8,000	<i>n.a.</i>	<i>n.a.</i>
2. Anodizing (moth balled)			~500		
3. Zinc Strip			~35		
4. Mop Water			~500		
5.					
6.					
7.					
8.					
Total Regulated Process Flow	<i>Final Check Tank</i>		~9,000 ⁽¹⁾	(1) Based on current reported flows. *These flows are not present at the compliance sampling point.	
Noncontact Cooling					
Boiler Blowdown			(900*)		
Reverse Osmosis			(1,900*)		
Demineralizer Regeneration					
Water Softening			(1,500*)		
Filter Backwash					
Compressor Condensate					
Storm water					
Total of Dilute Flows			0		
Unregulated Flows					
Sanitary					
TOTAL FLOW			~9,000 ⁽¹⁾		

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

All flows are conveyed by a sanitary sewer tributary to the Lebanon WWTP.

TOXICS MANAGEMENT

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

(Stated that none are known to be used)
36. Does the facility have a current toxic organic management plan (TOMP)? Y/N
If yes, is it being implemented? N.A. 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? N.A. Y/N
39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS

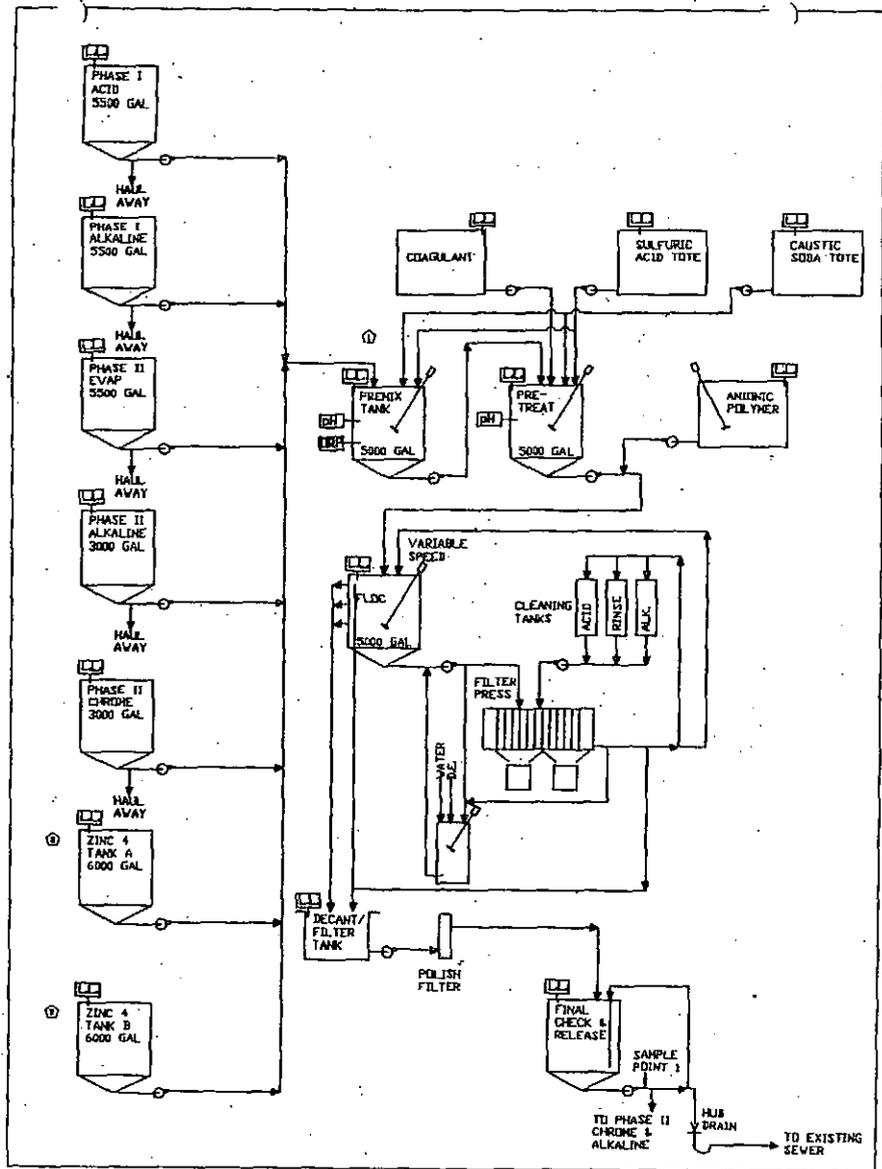
See inspection letter.

OTHER OBSERVATIONS

One of the pH buffer solutions used for calibrating the pH meter was expired.

Treatment system area continues to be clean and orderly.

If in-house zinc test result is above 1.0 mg/l the batch is returned to the beginning of the treatment process.



REV. 1	DATE: 11/15/87	BY: [Signature]	DESCRIPTION: ADD ZINC 4
REV. 2	DATE: 11/15/87	BY: [Signature]	DESCRIPTION: REMOVE CH. TREAT
REV. 3	DATE: 11/15/87	BY: [Signature]	DESCRIPTION: WASTE WATER TREATMENT FLOW DIAGRAM
REV. 4	DATE: 11/15/87	BY: [Signature]	DESCRIPTION: WWT FLOW R