



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

June 26, 2009

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, 2009^{9 MW} 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 for the period of July through December 2008:

- Failure to conduct monitoring for Total Toxic Organics (TTOs) or alternately submit a certification that you are implementing your approved Toxic Organics Management Plan (TOMP) pursuant to Part II. 4.A.2 of your permit;
- Reported cyanide value of 10 mg/l for July 14, 2008 exceeds the daily maximum and monthly average limits. I believe that this is a reporting error involving the unit of measure.

In addition to these reported violations, I noted the following:

- pH is being measured from the composite sample instead of from a grab sample within 15 minutes of sample collection.
- Chain of custody sheets continue to need to have information showing:
 - sample start and stop times;
 - aliquot volume and frequency; and
 - final composite sample volume.

Please note that this was a finding from my previous inspection.

- The chain of custody sheet for May 2009 does not have anything to indicate that a composite sample was collected as is required by your permit.

Mr. Tom Myers
June 26, 2009
Page 2

To address these findings, the following actions are required:

1. The self-monitoring report for the period of July through December 2008 must be amended as appropriate to address both cyanide and TTOs.
2. pH must be analyzed from a grab sample and documented on the chain of custody sheet.
3. Clear and detailed documentation must be provided on the chain of custody sheet for each sampling event to demonstrate that composite sampling is being performed in accordance with your permit.

Please provide a written response to this letter by July 17, 2009 that addresses my inspection findings. 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



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER
1DP00050*AP

PERMIT APPLICATION NUMBER
OHP000218

DATE CONDUCTED
June 4, 2009

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1425

TIME OUT
1530

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**

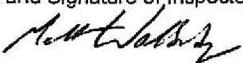
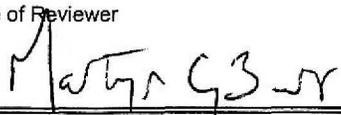
CONTACT (NAME/TITLE/PHONE)

**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, NA = Not Applicable)

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 6-26-09
Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date 6/26/09

INDUSTRIAL USER INSPECTION CHECKLIST

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

Date of inspection: **June 4, 2009**

Permit Application Number: **OHP000218**

IDP Number: **1DP00050*AP**

Facility Representative: **Tom Meyers**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **June 16, 2008**
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:

**Sampling for pH has to be a grab. Measurements are being taken from the composite.
Failed to sample or certify for TTOs in 2nd half 2008
May '09 Chain of Custody does not indicate that composite samples were collected.**

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: **~40**
6. Shifts/Day: **1**
7. Production Days/Year: **250**
(4-day work weeks with Fridays being for overtime)
8. Hours/shift: **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? Y/N
If yes, explain:

Aluminum is the main metal the process

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

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.

They haven't cleaned out the paint line tanks since last summer (normally done every six months in June and December).

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 a year now with business being down. 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 about once a year (because business has slowed) and contain about 1/3 inch of sediment. Cleanings are directed to the settling tank.

Approximately 1,200 gallons of sludge/water is removed during these events

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	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	<i>cleanout downstream from settling tank</i>	5,160 gpd	<7,000 gpd (1)	(1) Beginning in July 2008, reported flows have been about 25,000, 34,000, 14,000, 15,000, 15,000 and then 8,000 gpd. I was told that 2009 flows are <3,000gpd. (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).	
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	~1,000 (2)		
Unregulated Flows		NA	NA		
Sanitary		Not present at sampling point	Not present at sampling point		
TOTAL FLOW	<i>cleanout downstream from settling tank</i>	7,000 gpd	~8,000 gpd(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)* 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

pH is being measured on the composite sample – it needs to be from a grab sample

Chain of custody sheets continue to need to have information for sample start and stop times, aliquot volume and frequency and the final composite sample volume.

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

May 2009 chain of custody sheet does not have anything to indicate that a composite sample was collected.

July 2008 monitoring result for cyanide appears to have been reported using the wrong units (ug/l instead of mg/l)