



State of Ohio Environmental Protection Agency  
Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

December 1, 2008

Mr. Jay Heitz  
Gayston Corporation  
200 Pioneer Boulevard  
P.O. Box 430  
Springboro, Ohio 45066-0430

**Re: Gayston Corporation – Springboro -- Annual Inspection – Notice of Violation**

Dear Mr. Heitz:

On November 10, 2008, I conducted the annual industrial user (IU) inspection at your facility. The facility was represented by Jack Dunivan and Mitch Brown of Crown Environmental Services. The facility is regulated under the Metal Finishing New Source Pretreatment Categorical Standard, 40 CFR 433.17. The inspection covered the bonderlube lines, the chrome plating area, the zinc phosphate area, the pretreatment system, the anodizing line, and the manufacturing area.

The facility was one permit violation since the last inspection. The batch treatment of the wastewater is still being done on the first shift. The wastewater from the second shift is collected for treatment on the first shift. A treatment log is maintained on-site. Crown Services is the contract operator for the pretreatment system. The preservation methods are not being properly listed on the chain-of-custody form. Each sample bottle should have its own line on the form. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Gayston Corporation manufactures various parts for the recreational products and defense industries. Manufacturing processes at the facility include anodizing, drawing, lubricating, stamping, punch pressing, heat treating, machining, tumbling, cleaning, chromating, and the painting of aluminum and copper parts.

Regulated Flows and Pretreatment

The processes have remained the same since the last inspection (report dated December 10, 2002). Lube line #1 has been decommissioned. The anodize line is not being used currently, however, it will be used starting in the beginning of 2009 for a fin and housing part. The dyes will not be used, only the hard anodize portion of the line.

The pretreatment system is operating in a batch mode. The facility received a PTI in



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August 2008 for a batch treatment system for the concentrate tanks. The process water is generated during the first and second shifts and is collected, and then treated on first shift only. The pretreatment system is operated by Crown Solutions. The filtrate from deionization canisters from the chrome tanks are now discharging to the sewer system. The canisters are being recharged by Siemens. Crown Solutions arranges for the disposal of the pre-filter waste.

A complaint was received by USEPA on August 12, 2008. The complaint was forwarded to Ohio EPA on October 8, 2008, and I received it on October 21, 2008. The anonymous complainant alleged the facility was illegally etching chromate off of parts in order to rework the parts. This then goes into the lube room, goes into a tank, and is then put into the sewer lines. These process areas and tank are directed to the facility's pretreatment system. The wastewater is then treated for metals removal prior to entering the sanitary sewer. The facility is permitted for this discharge, and therefore, the complaint cannot be substantiated.

### Sampling

The facility is still using TestAmerica for sample collection and analysis. The chain-of-custody forms are not being completed as required. The collector is listing all of the grab samples on one line of the form, and all of the composite samples on a second line. The preservation methods are then checked for the line. On the form, it appears that all of the grab samples, including those of pH, were preserved with NaOH. Each separate bottle should have its own line and the applicable preservation methods listed. This must begin immediately. The following permit violation was noted at Station No. 1DP00006001:

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
Zinc, Total	01092	05/07/2008	4,370	ug/L	2,120 ug/L

The facility resampled, and returned to compliance. The reason for the violation was provided. This inspection will serve at the Notice of Violation.

### Waste Disposal

The sludge generated by the pretreatment system is hauled by Dempsey for disposal at Rumpke. The scrap metal is still being taken for recycling by Midwest Metal. Rinco takes the waste organics and paint thinners, and Dyncol takes the concentrated waste nitric and phosphoric acids. Clean Waters Ltd. is taking the used coolants.

### REQUIRED ACTION

Gayston Corporation must ensure the chain-of-custody forms are being completed properly. This must begin immediately.

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The assistance provided by your staff was appreciated. Should you have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marianne Piekutowski', with a long horizontal flourish extending to the right.

Marianne Piekutowski  
District Pretreatment Coordinator  
Division of Surface Water

Enclosures

Cc: Jack Dunivan, Gayston Corp.  
Terry Morris, Springboro  
Ryan Laake, DSW/CO



State of Ohio Environmental Protection Agency  
Southwest District Office

### Pretreatment Compliance Inspection Report

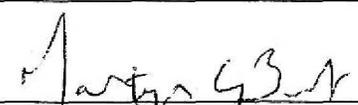
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00006*GP	OHP000060	11/10/2008	I	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Gayston Corporation 200 Pioneer Blvd. P.O. Box 430 Springboro, Ohio 45066	11:00 am	12/01/2006
	Exit Time	Permit Expiration Date
	1:00 pm	11/30/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jack Dunivan	937.746.8500x2025	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
City of Springboro WWTP	40 CFR 433.17	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
S	Pretreatment		

**Section D: Summary of Findings (Attach additional sheets if necessary)**

See attached report.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 12/11/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 12/2/08

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Gayston Corporation**

Date of inspection: **November 10, 2008**

OH Number: **OHP000060**

IDP Number: **1DP00006\*FP**

Facility Representative: **Jack Dunivan, Mitch Brown, Terry Morris**

Inspector(s): **Mari Piekutowski**

### COMPLIANCE

1. Date of last pretreatment inspection: **November 28, 2007**

2. Has the facility been in compliance with its permit limits since the last inspection? Y/N  
If no, explain:

**There was one daily zinc violation in May 2008. The company provided 24 hour notification and resampled. The facility returned to compliance.**

3. Is the facility in compliance with all other requirements? Y /N/ NA  
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: **248**                      6. Shifts/Day: **2 (skeleton 3<sup>rd</sup> shift – no water)**

7. Production Days/Year: **340**                      8. Hours/shift: **12**

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

**The anodize line is currently not running. A fin and housing product is coming in at the beginning of 2009. It will be using the anodize line.**

10. General facility description and operations:

**Manufacture precision metal parts such as recreational products and ordinance. Also making shot gun receivers.**

**FACILITY OPERATIONAL CHARACTERISTICS CONTINUED**

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

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

***The facility will be bringing in fin and housing units that will run on the existing anodize line. The dyes won't be used, just the hard anodize portion.***

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**WASTEWATER TREATMENT**

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

***See attached sheet.***

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? Y/N

PTI Number: **656546**

Date: **August 28, 2008**

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

If batch, list the frequency and duration:

***Discharge on the first shift only between 5:00 am and 1:00 pm when the operator is on duty. The operator will work over some days because of an increase in production.***

17. Who is responsible for operating the treatment system?

***Crown Solutions***

18. How often is the treatment system checked?

***The system is monitored on the first shift only when discharging. The wastewater from part of the first and second shifts is held for treatment on the first shift. The production shifts run from 7 am to 7 pm and 7 pm to 7 am.***

**WASTEWATER TREATMENT CONTINUED**

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

*There are alarms for level, pH, loss of air, and low chemical.*

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 probes, pumps, valves, pH modules for the controller, mixers.*

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? Y / N

23. Are residuals or sludges generated? Y / N

Method of disposal:

*Solids are landfilled. The chrome canisters are taken by Siemens (Minneapolis) for regeneration. The solids filtered out of the cleaning lines are also disposed of with the pretreatment sludge. Rumpke takes these non-hazardous solids. Scrap metals are taken by Midwest Metals. The disposal of the pre-filter for the chrome line is coordinated by Crown Solutions for disposal with Rineco. Rineco in Arkansas take the flammable wastes. The nitric acid goes to Dyncol in Michigan who routes it to EQ. Clean Waters Ltd. takes the used coolants. The chromic acid is disposed of at EQ via Dyncol.*

Frequency and amount of disposal:

*Approximately 20 yards are disposed of a minimum of two times a month.*

Name of hauler/landfill/disposal facility:

*Dempsey transports the solids to Rumpke.*

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

If land applying sludge, is there a sludge management plan? ~~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
Lubrication & Anodizing	<i>End-of-Pipe</i>	200,000	75,000		
Chromating	<i>End-of-Pipe</i>		30,000		
Heat Treat & Parts Washing	<i>End-of-Pipe</i>		47,000		
<b>Total Regulated Process Flow</b>			152,000		
Non-Contact Cooling			10,000		
Blowdown			-		
Reverse Osmosis & Softener			14,000		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			<100		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			5,000		
<b>TOTAL FLOW</b>		200,000	181,100		

*The facility is permitted for 200,000 gallons of categorical flow.*

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

*The facility has a general NPDES permit for the discharge of non-contact cooling water (OHN00001). The facility also has coverage under the "No Exposure" certification for its storm water discharges.*

**SELF MONITORING**

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

**Samples shall be collected from the manhole located at the end of Pioneer Blvd. Approximately 25 feet west of the boulevard and approximately 20 feet south of Parking Lot B.**

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?

**Take a water meter reading then subtract out the non-contact cooling water. The manufacturer did not recommend calibration.**

If estimated, describe method of estimation:

30. Is pH monitored continuously? Y / ~~N~~  
If yes, how often is the meter calibrated?

**There is a final pH check tank prior to discharging, but there is not a recorder for continuous pH monitoring on the effluent. It is not used for the required sampling monitoring. It is done in the field at the manhole.**

31. Does the facility collect its own samples? ~~Y~~ / N  
If no, specify the sample collector:

**Test America**

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 **Time composited samples.** ~~Y~~ / N  
Proper preservation techniques Y / ~~N~~  
Sample holding times Y / ~~N~~  
Chain-of-custody forms **Need to show each sample bottle on separate line.** ~~Y~~ / N

33. Are samples analyzed in accordance with 40 CFR 136? Y / ~~N~~

34. Laboratory conducting analyses:

**Test America**

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**TOXICS MANAGEMENT**

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35. Are any listed toxic organics used in the facility? Y/N  
If yes, identify organics:  
***Xylene in paint. Acetone in inks. Nothing goes to waste treatment.***
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? Y/N
39. Identify any potential slug load or spill areas:

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**REQUIRED FOLLOW-UP ACTIONS**

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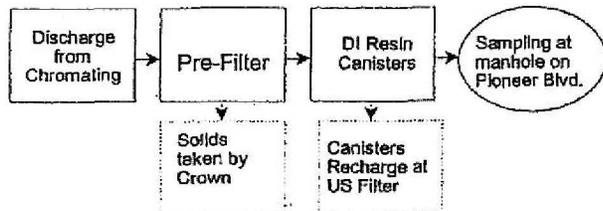
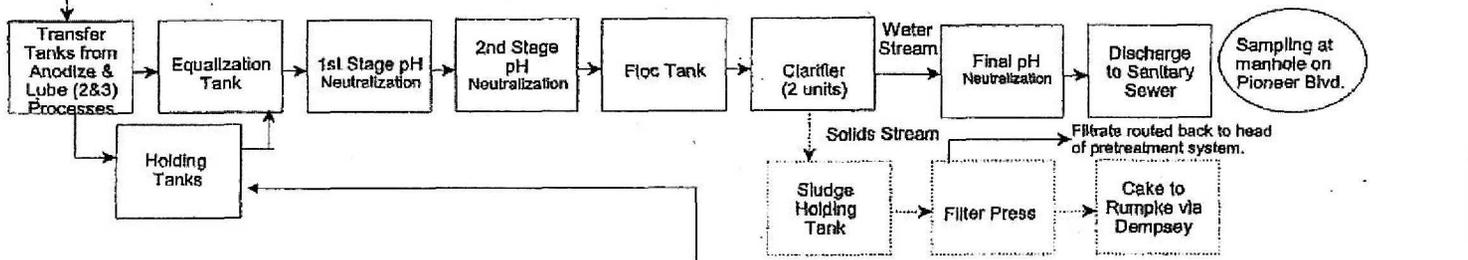
***Gayston Corporation must ensure the chain-of-custody forms are completed correctly. Each sample bottle must be listed on a separate line. On the form, it appears the pH sample was preserved with NaOH.***

# Gayston Corporation

## Process Schematic



## Pretreatment Schematic



## Batch Treatment Process

