



**Environmental
Protection Agency**

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

September 1, 2010

RE: KEN FORGING JEFFERSON PLANT
OHIO EPA PERMIT 3IS00121
JEFFERSON TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Ken Powell, Maintenance Supervisor
Ken Forging Inc.
1049 Griggs Road
Jefferson, OH 44047

Dear Mr. Powell:

As requested, I am revising the August 13, 2010 compliance inspection evaluation letter to correct a few errors noted in your August 17, 2010 response. This letter supersedes the August 13, 2010 letter. On August 10, 2010, a site inspection was conducted at the above referenced facility at 1049 Griggs Road, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, with you and Richard Kovach representing Ken Forging during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on September 17, 2008.

There are no floor drains within the manufacturing building. Industrial process waste water is limited to waters collected from outside sealed dumpsters discharged to storm water ditches at the perimeter of the facility. Wastewater flow to the package plant is limited to domestic sewage from employee restrooms.

Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility. Storm water is collected and discharged to ditches around the perimeter of the facility and is collected in a storm water pond located northeast of the manufacturing building. Materials are all managed under roof except for those materials managed in sealed roll-off boxes. When boxes are emptied, collected storm water within the boxes is collected and drained to the wastewater collection system.

Plant Sanitary Waste Water Treatment:

The plant receives plant sanitary wastes. The system consists of a trash trap, aerated equalization tank; extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The plant effluent discharges to a storm water pond located

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northeast of the facility, and the pond discharges to an unnamed tributary to Griggs Creek. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The trash trap was found reasonable cleaned. Mr. Powell indicated that the trash trap was cleaned out approximately 2 weeks prior to the August 10th inspection.
2. The design flow of the extended aeration plant is 2,500 gallons per day, and receives generally between 700 and 1,500 gpd. The aeration tank contents had a dark brown colored sludge that is well aerated with no foaming. The plant was observed in good working order.
3. A log book of repairs and observations is maintained at the WWTP. Marlene Knopsnider of Lewis Wastewater Management, performs routine operations at the WWTP, monitors the facility, and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Plant personnel possessing a Class A operator's license perform daily operations at the WWTP.
4. Clarifiers were observed in good working order, with a small amount of scum. The skimmer and return sludge lines were observed in operational condition. Sludge is removed from the system quarterly.
5. The slow sand filter dosing station pumps were cycled and found in operating condition. The plant was discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. The sand filters were raked and reasonably free of any debris, and had sidewall joints sealed.
6. The final discharge to the pond was found to be discharging clear. Some biological growth was noted at the discharge location (see attached picture).
7. The chlorine contact tank was found to be stocked with chemicals and aerating the wastewater prior to dechlorination.
8. The dechlorination system was found operable and stocked with appropriate chemicals.
9. No evidence of discharges was noted from the exterior double walled tanks or from the roll-off box storage area.

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NPDES Permit Compliance Review

Ken Forging operates under Permit 3IS00121*AD A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through July 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.48	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	11.48	12/15/2008
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.028	.0378	12/1/2008

A written explanation as to why this exceedence occurred must be provided, along with measures to ensure that they are not repeated was provided in the August 17, 2010 response letter. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Comment

Ohio EPA notes that during its last inspection that any outside roll-off boxes were recommended to be tarped or otherwise shielded from the elements. Although no liquids were observed emanating from the roll-offs, these roll-offs were observed as not tarped during the inspection. Tarping the roll-off boxes will minimize the accumulation of liquids in them that must be treated through the waste water treatment plant. In your August 17, 2010 response letter you indicated that you are still investigating roll off covers suitable for your needs. Other materials stored outside should be similarly tarped.

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Based on the above information, Ken Forging Inc. is considered to be in substantial compliance with the terms and conditions of the NPDES permit. Your August 17, 2010 letter has satisfactorily responded to the information requested in the August 13, 2010 inspection letter.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is fluid and cursive, written over the printed name.

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

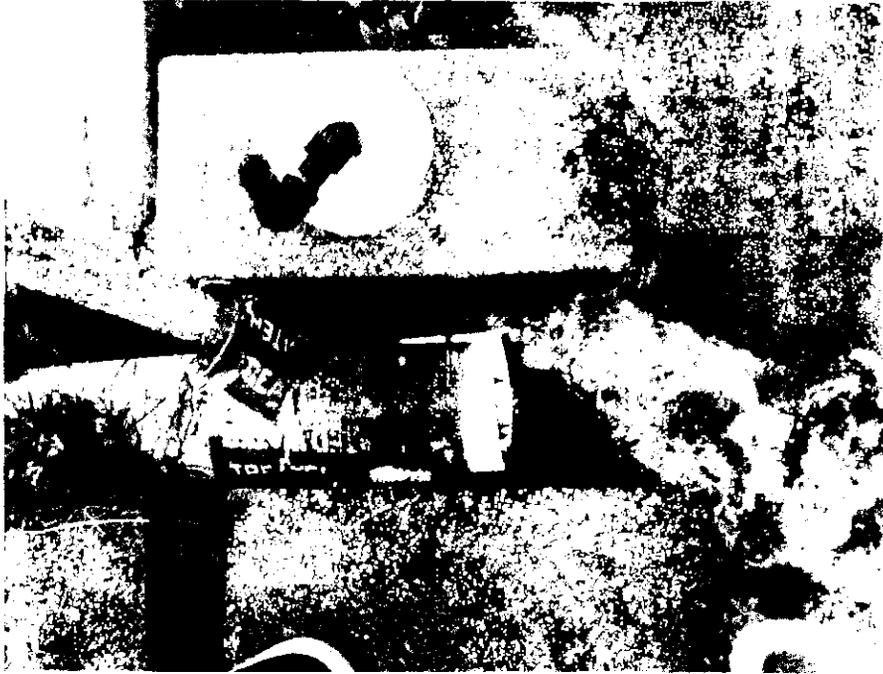
File: Ken Forging (Jefferson Twp) Ashtabula Co/Industrial P/C



Roll-Off Box Storage Area



Storm Water Discharge Location (typical)



Final Discharge Location of WWTP (Outfall 001)