



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Defiance County  
City of Defiance  
Pretreatment

June 2, 2010

Mayor and Council  
City of Defiance  
324 Perry Street  
Defiance, Ohio 43512

Dear Mayor and Council:

On April 13, 2010 and May 25, 2010, a pretreatment compliance inspection (PCI) was conducted of the City of Defiance's approved pretreatment program. Mr. Mark Lehnert, Assistant Superintendent, was available for both inspections and answered our questions. The inspection followed a checklist developed by the U.S. EPA designed to evaluate the major aspects of the program. On April 13, 2010, Ms. Dana Martin-Hayden, Ohio EPA, accompanied Mr. Lehnert on his pretreatment inspection of S.K. Handtool.

The PCI findings are summarized below:

1. The City has conducted all industrial user sampling as required.
2. The City has not conducted all industrial user inspections as required.
3. The City has not conducted all industrial user permit renewals as required.
4. Review of the City's Enforcement Response Plan (ERP) determined that the reference for criminal, civil and administrative fines was inaccurate and needs updating.
5. A file review of Defiance Precision Products Plant #2 indicated that the facility is now in compliance for Oil and Grease after their discharge limit had been increased from 200 mg/l to 1000 mg/l. The facility was under a schedule of compliance in their permit, which included pollution prevention measures to comply with their permit limits. This change in limits may require a modification request be submitted to the Ohio EPA Pretreatment Unit. We will work with the City to investigate this issue.
6. A file review and inspection was also completed for S.K. Handtool, which has a history of violating their effluent limit for chromium. This facility released a slug load of chromium contaminated wastewater to the City of Defiance and did not notify the City of the release in April of 2008. During the April release, the City of Defiance suffered limit excursions, due to Chromium contamination killing the plant's nitrifying bacteria. During our inspection we observed the newly installed pretreatment system. All chemical processes were shut down on March 24, 2010, due to the loss of an operator capable of running these systems.

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The facility was in the process of hiring another chemical engineer to operate the system. During this inspection, it was discovered that the roof was leaking onto portions of the plating line. County EMA and local fire department officials were notified.

7. The City conducted a follow up inspection at SK Handtool and they determined that there was no longer a process flow from the facility because production had been shut down. The City suspended their permit until further notice. We recommend at least pH monitoring during storm event(s) to determine if a discharge from the facility exists that could impact the City's sewerage system.
8. The pretreatment program does not have enough people to effectively implement this program and the City is falling behind in inspection and permitting requirements. In the past, the City would have had the resources available to continue monitoring a facility that is having water infiltration issues and chemical storage issues. Instead, due to the lack of resources in this program, the Industry's permit has been suspended.
9. Defiance currently has 15 industrial users with 4 being categorical.

A copy of the completed inspection checklist is enclosed for your review. The City should address all actions listed in section III, pages 20-25, of the attached inspection report. If you have any questions or comments, please call Dana Martin-Hayden at (419) 373-3067.

Yours truly,



Elizabeth A. Wick, P.E.  
District Engineer/ Unit Supervisor  
Division of Surface Water

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Enclosure

pc: Mike Lehnert, Asst. Superintendent, Defiance WPCD, attachment  
John Pasquarette, NWDO, DHWM, attachment – electronic copy  
Ryan Laake, DSW, OEPA, CO  
DSW-NWDO File, attachment