



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 13, 2011

RE: MEDINA COUNTY
SPENCER
SPENCER GORGE & MANUFACTURING
225 N. MAIN STREET
(NPDES NO. 3IS00087)

Spencer Forge & Manufacturing
Attn: Mr. Lee Hahner, VP
PO Box 68
Spencer, OH 44275

Dear Mr. Hahner:

On May 24, 2011, a compliance evaluation inspection was conducted on the wastewater treatment works serving the Spencer Forge & Manufacturing facility, located at 225 N. Main Street, Spencer, Medina County. The purpose of the inspection was to evaluate the facility's operation and maintenance condition, and compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit to discharge, prior to renewal of the permit.

The facility utilizes carbon and alloy steel to manufacture upset forgings, and machined and heat treated axles and shafts. Three heavy duty forging machines are used in the manufacturing.

A closed loop cooling system is used to cool the electric cabinets on 3 induction heating units, and contact cooling water is used to cool the dies and forgings. The contact cooling water is comprised of a constant stream of water approximately 1" in diameter, which flows over the dies, and then flows to an oil and water separator/skimmer.

The oil and water separator/skimmer consists of a 3 compartment tank, with 2 baffles, and a rope type of skimmer. Water from the separator is pumped out to the onsite pond, and eventually discharges off the property. Absorbent 'socks' are utilized around the pipe where the contact cooling water enters, and exits, the pond. Water from the pond discharges to a ditch flowing adjacent to the AC & Y railroad.

According to Mr. Twining, water samples collected for analysis, and reporting to the Ohio EPA, have been taken at the outlet end of the pond, prior to discharge to the railroad ditch. Mr. Twining indicated his concern that the pond also receives stormwater flow/runoff from the surrounding roadsides and fields, and could cause the samples to not be representative of actual process water being discharged from the manufacturing process.

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A review of the NPDES permit conditions for Station 001, Process Effluent, found the description of Station 001 to be at 'the outlet of oil/water separator, inside the shed which houses the separator'. Therefore, collection of the water at the end of the pond does not meet the intent of the NPDES permit. **Please note, the process water sample collection must be from the end of the oil/water separator process, prior to discharge to the pond.**

Tracing the inlet to the pond in an upstream direction did reveal the fact that water from roadside ditches along West Main Street do drain to the pond. Additionally, there are several farm fields which drain stormwater runoff to the ditch which enters the pond. The pond is being considered to be waters of the state for this reason.

At the time of the May 24th inspection, the surface of the water in the pond was covered with duckweed, and the effluent from the pond did not exhibit a visual oil sheen.

A reconnaissance inspection of the Spencer Forge facility was conducted in March 2011, by Mr. Mike Stevens of this office. During Mr. Stevens' inspection it was noted that the MagLite magnetic meter and Chessel chart recorder were both disconnected and not operational. Spencer Forge was requested to reconnect the meter and flow recorder as soon as possible.

It was indicated during this inspection that a new recorder has been ordered, and the box housing the equipment has since been installed, awaiting the arrival of the equipment.

Mr. Stevens' March 2011 correspondence also detailed that Spencer Forge must be in compliance with the NPDES permitted effluent limits for 4 consecutive months before permit renewal. If compliance has not been accomplished since March 2011, the sample collection location change should prove to be more characteristic of the actual process water being discharged.

A review of the compliance history for this facility, for the period of January 1, 2007 through June 1, 2011, was conducted utilizing data submitted in the electronic Discharge Monitoring Reports (eDMRs). The SWIMS data management tracking system found the following numeric effluent limits violations (based upon the data submitted to the Ohio EPA):

SPENCER FORGE & MANUFACTURING
NPDES PERMIT NO. 31500087
EFFLUENT NUMERIC VIOLATIONS
(Jan. 1, 2007 – June 1, 2011)

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
February 2008	Total Suspended Solids	30D Conc	13	23.1	2/1/2008
March 2008	pH	1D Conc	6.5	5.	3/20/2008
February 2011	Total Suspended Solids	30D Conc	13	17.	2/1/2011
March 2011	Total Suspended Solids	30D Conc	13	28.	3/1/2011
March 2011	Total Suspended Solids	30D Qty	0.97	1.0598	3/1/2011
April 2011	Total Suspended Solids	30D Conc	13	56.5	4/1/2011
April 2011	Total Suspended Solids	30D Qty	0.97	2.13853	4/1/2011
April 2011	Total Suspended Solids	1D Conc	36	38.	4/12/2011
April 2011	Total Suspended Solids	1D Conc	36	75.	4/25/2011
April 2011	Total Suspended Solids	1D Qty	2.59	2.83875	4/25/2011

Other items discussed during the May 24th inspection:

- Sampling was started after the March 2011 correspondence with Ohio EPA. However, the location was at the end of the pond, not at the end of the oil/water separator process. It is felt that the sample results, and recent suspended solids violations, have been influenced by stormwater drainage into the pond from sources other than the noncontact cooling water being discharged from the oil/water separator.
- Effluent samples are collected by Mr. Twining, in bottles provided by Alloway labs. The bottles are provided with all necessary preservatives already in them.
- A chain of custody form for tracking of the samples is employed by Spencer Forge and their analytical lab.
- The samples are sent to the lab in iced, security taped containers.
- Present employment at the Spencer Forge facility is approximately 53 persons. The number of employees has varied between 45 and 100 persons.
- It was asked whether or not the pond could be eliminated totally, if it is not required to be a part of the treatment scheme. Please note that since the pond is considered to be waters of the State, permission from the Army Corps of Engineers (ACOE) would be required, as would probably a permit from the ACOE.
- Akron Waste Oil hauls away the oil collected from the oil/water separator. The skimmer was last pumped in January 2011.

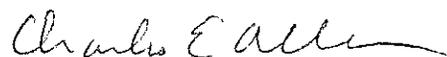
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Please inform this office, in writing, when the flow meter and chart recorder have been installed, as well as when the new sample collection location has been constructed.

Spencer Forge should continue with all efforts that will enable its facility to consistently meet its NPDES permit limits.

If there are further questions regarding this letter, please contact this office.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

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