



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 19, 2008

RE: WAYNE COUNTY
STAHL A SCOTT FETZER CO.
NPDES 3IS00111

Mr. Tolulope Makinde
Manufacturing Engineer
Stahl a Scott Fetzer Company
3201 W. Old Lincolnway
Wooster, OH 44691

Dear Mr. Makinde:

On February 14, 2008, this writer met with Kevin Chapman and Brian Hamlin to conduct an inspection of the industrial operations and the sewage treatment plant serving your facility. The inspection was conducted to review the operation and maintenance of the sewage treatment plant and to verify there are no industrial process waters discharged from the facility.

- 1) According to our records, a drain line ties in several floor drains and roof drains from the warehouse. This storm drain discharges on both the north and south side of the facility. Our office is concerned with the interior warehouse floor drains that are tied into this storm drain. Process water must not be discharged to the storm sewer. Please verify the number of floor drains at your facility, where they discharge to and what processes are conducted in the vicinity of the floor drain.
- 2) It is our understanding that the non contact cooling water from the spot welders is not discharged to the sewage treatment plant. Two large holding tanks that are located within the warehouse contain recycled water from the paint line phosphate washing operation. The phosphate wash water sent to the holding tanks is recycled through the system and is pumped out once every three months by Enviro Clean. Please verify this information in writing and correct any inaccuracies. As a reminder, the only wastewaters sent to the sewage treatment plant must be sanitary wastewater.
- 3) Our records show the National Pollutant Discharge Elimination System (NPDES) permit for the above referenced facility will expire on June 30, 2008. Please be aware that, according to your NPDES permit, "In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as required by the Ohio EPA no later than 180 days prior to the date of expiration". To date, this office has not received the renewal permit application. Please submit your renewal application as soon as possible.

- 4) At the time of the inspection, all treatment units were in service and the effluent being produced appeared to be clear. The mixed liquor in the aeration tank was a light brown color with some foam present. The tank appeared to have adequate air circulation and the return sludge line was returning a clear liquid. The return sludge line should be returning a concentrated solids mixture which would be represented by a dark brown colored liquid. Since the sludge return line is running clear, there may be an inadequate balance of solids in the system and it is possible the settling tank sidewalls and/or weirs need to be scraped down. Please provide this office with the frequency of solids removal from the system and include the provider you have contracted with to complete this work.

- 5) One blower was operating at the time of the inspection and the air circulation within the tanks appeared to be fair. The clarifier skimmer appeared to be working effectively and was slightly submerged with some solids buildup around the surface. As a reminder, there should only be 1/8-inch of fluid above the skimmer.

- 6) The sand filters were flooded and the filter media appeared to be completely saturated in some areas. The filters must be dewatered and the media must be checked to ensure it meets all Ohio EPA standards. As a reminder, Ohio EPA requirements for filter sand are that it has a uniformity coefficient not greater than 3 and an effective size between 0.4-1.0 mm.

The facility compliance record from the period of January 1, 2006, through February 1, 2008, revealed the following violations for outfall 001:

Date of Violation	Parameter	Permit Limit	Limit Type	Reported Value
June 1, 2007	CBOD 5 Day	10	30 Day Conc.	10.2
June 28, 2007	CBOD 5 Day	15	1 Day Conc.	15
August 17, 2006	Chlorine Tot. Res.	.019	1 Day Conc.	.07
May 4, 2006	Dissolved Oxygen	5	1 Day Conc.	4.7
June 1, 2006	Dissolved Oxygen	5	1 Day Conc.	4.7
July 13, 2006	Dissolved Oxygen	5	1 Day Conc.	2.8
January 4, 2007	Dissolved Oxygen	5	1 Day Conc.	4.3
June 28, 2007	Dissolved Oxygen	5	1 Day Conc.	4.8
Dec. 27, 2007	Dissolved Oxygen	5	1 Day Conc.	4.2
July 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	3100/100ml
July 13, 2006	Fecal Coliform	2000/100ml	1 Day Conc.	3100/100ml
May 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	4900/100ml
May 25, 2007	Fecal Coliform	2000/100ml	1 Day Conc.	4900/100ml
June 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	3700/100ml
June 28, 2007	Fecal Coliform	2000/100ml	1 Day Conc.	3700/100ml
July 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	1200/100ml
Sept. 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	1000/100ml
Oct. 1, 2007	Fecal Coliform	1000/100ml	30 Day Conc.	4900/100ml
Oct. 25, 2007	Fecal Coliform	2000/100ml	1 Day Conc.	4900/100ml

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Date of Violation	Parameter	Permit Limit	Limit Type	Reported Value
July 1, 2007	Nitrogen, Ammonia NH ₃	2.0	30 Day Conc.	2.47
November 2, 2006	pH	6.5	1 Day Conc.	6.4
January 4, 2007	pH	6.5	1 Day Conc.	6.3
Feb. 22, 2007	pH	6.5	1 Day Conc.	6.3
May 25, 2007	pH	6.5	1 Day Conc.	5.7
Sept. 27, 2007	pH	6.5	1 Day Conc.	6.1
Dec. 27, 2007	pH	6.5	1 Day Conc.	6.4

These violations were not followed up with correspondence to our office. Failure to report any violation of your NPDES permit is an additional violation of Part III, Section 12 of your permit. Violations of your NPDES permit may subject your facility to possible enforcement action involving civil and monetary penalties.

The bacteria violations noted above would indicate the UV system is not operating effectively. This matter was discussed during the site inspection and it was mentioned that a bulb may be burned out or there may be sediment buildup in the unit. We suggest you conduct a routine maintenance check on the UV system as soon as possible and make any required repairs. The dissolved oxygen violations were also discussed during the site visit. The effluent sample for dissolved oxygen is taken in the effluent tank. The effluent tank was inspected and leaves and other debris were found to be accumulating within the tank. This accumulated debris must be cleared out since it could be affecting the dissolved oxygen levels of the plant effluent.

No later than March 20, 2008, we request that you provide a written explanation as to why the above violations have occurred and what steps will be taken to correct them. Should you have any comments or questions regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

cc: Kevin Chapman, Stahl
Brian Hamlin, Stahl

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO

File: Industrial/Stahl/Permit Compliance