



**Environmental
Protection Agency**

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

September 28, 2010

RE: 3DP00009*CP
COMMERCIAL TURF PRODUCTS
INDUSTRIAL USER INSPECTION
STREETSBORO
PORTAGE COUNTY

Jim Stavropulos
Commercial Turf Products, Ltd.
177 Miller Parkway
Streetsboro, Ohio 44241

Dear Mr. Stavropulos:

On August 31, 2010, this office conducted an Industrial User inspection of the above facility. The Ohio EPA was represented by Donna Kniss and Ryan Laake, and Portage County Water Resources was represented by Wayne Carkido and Jim Akerley. You, Mike Sobera, and Ed Waddles represented the company. You also provided additional information in a telephone conversation on September 28, 2010. Commercial Turf Products discharges to the Portage County Streetsboro-Hudson Sewer District No. 4 waste water treatment plant and has been issued Indirect Discharge (IDP) permit 3DP00015*CP. The purpose of the inspection was to evaluate Commercial Turf Products' (CTP) compliance with the existing IDP.

CTP employs approximately 400 people in a 2 shift/day, 5 day/week schedule. There is a shutdown period in the summer. CTP fabricates commercial outdoor power equipment. As part of that operation, CTP conducts iron phosphating on carbon steel prior to painting parts. The iron phosphating process consists of nine stages: 2 alkaline cleaning baths; 2 rinses with countercurrent flow; acid cleaning, rinse, iron phosphating, and 2 rinses with countercurrent flow. Rinse water from the phosphating line is discharged directly into the sanitary sewer. Alkaline, acid, and the iron phosphating baths are periodically neutralized, pumped to the existing above ground storage tank, and hauled off site for disposal. CTP is currently evaluating a different surface preparation method that utilizes citric acid. Current information indicates that the citric acid cleaning will not be regulated as a 40 CFR 433 process because there is no change in the metal surface, and etching does not occur.

The sample location identified in the IDP is an older sample station. Process water is routed through one of three screens prior to discharge to the sanitary sewer. The samples are currently collected from a valve at the bottom of one of three screens. Sample collection is conducted by company personnel. Composite samples are manually composited from three aliquots taken over both shifts. The sample containers are then driven to the laboratory, usually the same day. The sample containers are not cooled; while this would not interfere with the integrity of the preserved metals samples, cooling below 6°C is required for cyanide. In the future, please cool the contents of the travel container.

Laboratory analyses are conducted by North Coast Environmental, Inc. CTP is using the pH obtained by the laboratory on its Discharge Monitoring Reports (DMRs). This office instructed CTP to report the pH they obtain when the sample is taken, because pH should be analyzed immediately.

JIM STAVROPULOS
SEPTEMBER 28, 2010
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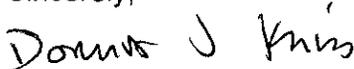
We discussed the regulatory requirements for flow proportional sampling unless another method is determined to produce a representative sample, and that fact documented in the files. The rinse overflow rate is based on tank loadings, which in turn are based on surface area. The overflow rate is constant during any given day, so manual compositing should produce a representative sample. If there are changes in plant operations, the current sampling methods must be reevaluated. We also discussed possible dilution water flows that would require the use of the Combined Wastestream Formula, and determined that there were no significant dilution flows.

A review of the DMR data from January 1, 2006, through January 1, 2010, showed some reporting problems, with zeros being the reported value and "AA" values with extremely high detection limits. You stated that you realized that there were reporting errors and corrected your subsequent reports, which was reflected in the DMR data.

Commercial Turf Products complies with the Total Toxic Organics (TTO) requirements by conducting a semiannual analysis of the wastewater. We discussed this and the Toxic Organic Management Plan (TOMP) alternative. Mr. Waddles stated that the company prefers evaluating effluent analytical results over developing a TOMP that may become incorrect because of changes in purchased materials. A TOMP can be submitted to the Ohio EPA at any future time, if the company decides this is a preferable course of action, but semi-annual testing must continue until the TOMP is approved.

If you have any questions or comments, please contact me at 330-963-1285. I can also be reached via e-mail at donna.kniss@epa.state.oh.us.

Sincerely,



Donna J. Kniss
Environmental Engineer
Division of Surface Water
Northeast District Office

DJK:bo

pc: Wayne Carkido
Ed Waddles, MTD Products Inc.
Ryan Laake, DSW CO

ec: Mike Stevens, DSW NEDO

File: Pretreatment Industrial User/Permit-Compliance

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: Commercial Turf Products

Date of inspection: 8-31-10

OH Number:

IDP Number:

Facility Representative:

Inspector(s):

COMPLIANCE

1. Date of last pretreatment inspection: 4/5/2006

2.  call 216-458-1976 limits since the last inspection? Y / N

COMMERCIAL TURF PRODUCTS

Commercial Turf Products, Ltd.
1777 Miller Parkway
Streetsboro, Ohio 44241

3. ents?

Jim Stavropulos
Plant Engineering Manager

phone 330.995.7000 ext 7142
fax 330.995.7015
email jim.stavropulos@mtdproducts.com



MTD Products Inc
Corporate Office
P.O. Box 368022
Cleveland, OH 44136-9722
phone 330.273.7441
fax 330.273.4617
ed.waddles@mtdproducts.com

City water requirements

None of the above five covers is no explain:



COMMERCIAL TURF PRODUCTS

Commercial Turf Products, Ltd.
1777 Miller Parkway
Streetsboro, Ohio 44241

Ed Waddles
Corporate Environmental Manager

Shipping Address:
5965 Grafton Road
Valley City, OH 44280
mobile 419.564.2150

Mike Sobera
General Manager

phone 330.995.7011
mobile 216.789.8174
fax 330.995.7015
email mike.sobera@mtdproducts.com

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FACILITY OPERATIONS

5. Number of Employees ~400

6. Shifts/Day: 2 shift / day m-F

7. Production Days/Year: Shutdown in summer

8. Hours/shift: no shutdown this summer

9. Any production changes since the last inspection? Y / N

If yes, explain:

no changes

10. General facility description and operations:

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y / N
 If yes, explain:
no - may be in future - see notes

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

WASTEWATER TREATMENT

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

- 1- 5% KOH @ 115°P
 - 2- 5% KOH 115°F
 - 3- rinses →
 - 4- rinses ↓
 - 5- laser clean H₃PO₄ to remove carbon flash
 - 6- rinse →
 - 7- mono phosphate salt, H₃PO₄
 - 8- rinses →
 - 9- rinses ↓
- 3 rinse tanks to sump
all about same flow
rate*

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: _____ Date: _____

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

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

18. How often is the treatment system checked?

WASTEWATER TREATMENT CONTINUED

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

20. Is there an operations and maintenance manual? Y / N

21. Is an inventory of critical spare parts maintained? Y / N
If yes, list:

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:

Frequency and amount of disposal:

Name of hauler/landfill/disposal facility:

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
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow					
Noncontact Cooling	none				
Blowdown	not to process don't have				
Reverse Osmosis Condensate					
Demineralizer Regeneration	into sump				
Filter Backwash	none				
Compressor Condensate	none				
Storm water	none				
Other Dilute Flows					
Unregulated Flows(provide list)					
Sanitary					
TOTAL FLOW					

water softener
part of the
washer process

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

SELF MONITORING

26. Sample location(s) described in the facility's permit:
sample description in permit from older operation - see notes for sample location
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? *dedicated water meter* Measured / Estimated
 If measured, how often is the meter calibrated?
 If estimated, describe method of estimation:
30. Is pH monitored continuously? Y / N
 If yes, how often is the meter calibrated? *see notes*
31. Does the facility collect its own samples? Y / N
 If no, specify the sample collector:
32. Are appropriate sampling procedures followed? *lab pH - hold to do immediately*
 Monitoring frequencies Y / N
 Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N
 Flow proportioned samples *see notes* Y / N
 Proper preservation techniques Y / N
 Sample holding times Y / N
 Chain-of-custody forms *see notes* Y / N
33. Are samples analyzed in accordance with 40 CFR 136? Y / N
34. Laboratory conducting analyses:
North Coast

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / N
If yes, identify organics: *see notes*
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:

REQUIRED FOLLOW-UP ACTIONS

Phone conversation w/ Jim Stavropoulos, 9-28-10
When need to dump Alkaline or acid bath, neutralize, pump to Above ground storage tank, have it hauled off. Slight overflow from stages 6, 8, 9 (all rinses) - stage 3 (rinse) has not been overflowing because it is also used as make-up water