



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 26, 2007

RE: 3DP00020*CP
FORMTECH
INDUSTRIAL USER INSPECTION
MINERVA
CARROLL COUNTY

Ms. John Gullo, Jr.
FormTech Industries LLC
9312 Arrow Road, NW
Minerva, OH 44657

Dear Mr. Gullo:

On August 16, 2006, this office conducted an Industrial User inspection of the FormTech facility located at 9312 Arrow Drive NW in Minerva, Ohio. Ohio EPA was represented by Donna Kniss and Julia Zhang, and you represented the company. You provided additional information in an e-mail on August 25, 2006, and in a telephone conversation on June 25, 2007. FormTech discharges to the village of Minerva waste water treatment plant and has been issued Indirect Discharge (IDP) permit 3DP00020*CP. The purpose of the inspection was to evaluate FormTech's compliance with the existing IDP.

FormTech manufactures steel forgings on predominately carbon steel. Some steel contains chromium or molybdenum, but stainless steel and alloy steel are not used. As part of the cold forming process, zinc phosphating is conducted to provide lubrication. The zinc phosphating process consists of alkaline cleaning, hot rinsing, zinc phosphating, cold rinsing, neutralizing, and lubrication. Rinse water overflow is routed directly to the pretreatment system, and the rinse tanks periodically emptied into a collection tank and bled into the pretreatment system.

A review of the Northeast District Office files has indicated that a number of permits-to-install (PTI) were issued to MascoTech Forming Technologies, Inc. Because of that, it is difficult to determine the current configuration of the pretreatment system. There is an undated process flow diagram developed by Plymouth Technologies for Masco Forming Technologies in the file, but that diagram does not appear to agree with the description of the pretreatment system you provided during the inspection. Please confirm that the PTIs issued to MascoTech are for the FormTech pretreatment system, and provide an updated process flow diagram with equipment and dimensions.

There are log sheets kept for the wastewater pretreatment system, wastewater pretreatment system pH meters, and the hand-held pH meter. The hand-held pH meter is calibrated daily, and the pretreatment system meter calibrated weekly. The hand-held meter is used to confirm the pretreatment system meter reading.

The following wastewater streams are routed to the pretreatment system: phosphating line rinses, 0-18,000 gpd; die wash station, pressure wash station and floor scrubber water through the pressure wash station drain, 0-2,000 gpd; and boiler blowdown and filter backwash, 0-200 gpd. Based on conversations you had with other FormTech personnel, the Magnaflux fluid has not been treated in the pretreatment system.

Sample collection is conducted by FormTech personnel. Laboratory analyses are conducted by Ream and Haager. A review of the chain of custody (COC) forms show that cyanide is collected as a composite, and suspended solids and CBOD₅ are collected as grab samples. The IDP requires that cyanide be a grab sample, and suspended solids and CBOD₅ be composite samples. FormTech should confirm with Ream and Haager that all samples were not collected in accordance with the terms of the IDP, and ensure that the samples are collected properly in the future. Sample bottles are placed in a cooler without ice and the cooler placed in the lobby. Sampling protocols require that the samples be maintained at 4°C. Placing the samples in an uncontrolled area (the lobby) breaks the chain of custody; samples should be under the direct control of the personnel noted on the COC at all times. During our telephone conversation on June 25, 2007, you stated that the samples were being kept in a cooler with "blue ice" and that the samples were kept inside the controlled area until pickup.

A review of the IDP monitoring data from January 2004 through November 2006 in the Ohio EPA database showed that results are reported for outfall 601, while the outfall in the permit is labeled 001. This is apparently a misunderstanding, based on the sample location being the discharge from the pretreatment system tank 601, and the fact that the storm water permit is renewed, the IDP outfall designation will be changed to 100.

The data review indicated the following IDP permit limit violations:

Parameter	Result	Limit	Date
Total Toxic Organics	2318.5 µg/l	2130 µg/l	2/13/2004
Cadmium, Total	108 µg/l	11 µg/l	2/21/2004
Lead, Total	144 µg/l	107.7 µg/l	2/21/2004
Nickel, Total	320 µg/l	251.3 µg/l	4/14/2006
Nickel, Total	287 µg/l	251.3 µg/l	4/08/2006
Zinc, Total	752 µg/l	358.7 µg/l	4/15/2004
Zinc, Total	428 µg/l	358.7 µg/l	4/16/2005
Zinc, Total	537 µg/l	358.7 µg/l	4/11/2005
Zinc, Total	1342 µg/l	358.7 µg/l	4/14/2005
Zinc, Total	2571 µg/l	358.7 µg/l	4/22/2005
Zinc, Total	541 µg/l	358.7 µg/l	4/26/2005
Zinc, Total	581 µg/l	358.7 µg/l	5/10/2005
Zinc, Total	438 µg/l	358.7 µg/l	4/14/2006
Zinc, Total	772 µg/l	358.7 µg/l	4/27/2006
Zinc, Total	382 µg/l	358.7 µg/l	4/08/2006

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There have been a number of violations of the zinc permit limit, with some results being extremely high. However, FormTech has complied with the zinc permit limit since May 22, 2006. Please provide documentation on the actions FormTech has taken, and will take, in order to ensure compliance with the zinc permit limit.

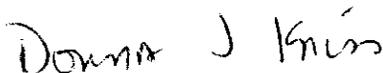
It appears that Total Toxic Organics (TTO) had not been sampled since December 2004. We discussed this during the inspection, and you indicated in the August 25th e-mail that you are going to have a TTO analysis conducted in September 2006 and would report the results to me. We also discussed that FormTech can develop a Toxic Organics Management Plan (TOMP) after the TTO results indicate low TTO concentrations, and I e-mailed you the link for the TOMP guidance on August 18, 2006. A TTO analysis was conducted on October 10, 2006, with the result well below the permit limit.

The data reported for the second half of 2006 gave detection limits that were actually the IDP concentration limits for all parameters reported as "AA". We discussed in our June 25, 2007 telephone conversation that the number reported should be the MDL given on the laboratory report, not the permit limit.

The IDP was issued in 2002 to Metaldyne. You stated that FormTech took ownership of the company on March 11, 2006, and filed Notices of Transfer for the storm water general permit (3GR00872*AG) and the IDP. You provided copies of the Notice of Transfer forms. The copies you provided, and the forms in Ohio EPA files, were not signed. Please submit a signed Notice of Transfer form to Ohio EPA Central Office and Northeast District Office.

Please respond within 30 days of the receipt of this letter, discussing the issues identified above. 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

DJK/mt

cc: Don Ludke, Village of Minerva

ec: Julia Zhang, Ohio EPA, DSW, CO

File: Pretreatment Industrial User/Permit-Compliance