



**Environmental
Protection Agency**

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

June 17, 2010

RE: MPI LABEL SYSTEMS
3DP00043*AP
MAHONING COUNTY

NOTICE OF VIOLATION

Mr. Joe Oyster
General Manager
MPI Label Systems
450 Courtney Road
Sebring, OH 44672

Dear Mr. Oyster:

On June 2, 2010, representatives of this office conducted an Industrial User Inspection of the above facility. The Ohio EPA was represented by Donna Kniss and Ryan Laake, and Lee Hatton represented the Village of Sebring. Mike Phillips and Sam Oyer represented the company. MPI Label Systems (MPI) has been issued Indirect Discharge (IDP) permit 3DP00043*AP for discharges to the Sebring wastewater treatment plant (WWTP).

This office has reviewed the Discharge Monitoring Report (DMR) data from the effective date of the permit, September 1, 2006, through the last DMR required submittal, due January 20, 2010. Additionally, we have discussed MPI Label Systems with Lee Hatton, the superintendent of the Sebring wastewater treatment plant (WWTP). Through this process, we have identified a number of IDP violations.

Part II, Other requirements, Section 2 requires MPI Label Systems to submit a copy of each DMR to the Village of Sebring WWTP. Mr. Hatton indicated that he has not been receiving these reports, which has been a repeated violation of this permit condition. Please note that the IDP contains the physical address for the WWTP. Reports should be sent to the Village's mailing address, 135 East Ohio Street.

Part III, General Conditions, Section 3.B. requires MPI Label Systems to notify the Ohio EPA Northeast District Office within 24 hours of becoming aware of any violation of a daily maximum effluent limit. As discussed below, there have been numerous daily maximum limit violations, but we do not have any records that MPI Labels notified the Ohio EPA of those violations.

As shown in Attachment 1 many of the copper concentrations are extremely high, well in excess of what a well treated discharge would contain. A closer review of the reported effluent copper concentrations showed that 17%, 11 out of 64, exceeded the permit limit.

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In a letter dated February 20, 2007, Jack Schragg stated that MPI installed self-contained parts cleaners, eliminating the ink from entering the sewer system through the shop area sinks, which do not discharge to the Beckhart treatment unit. During the inspection, we noted that there were self-contained parts cleaners at each sink in the shop area; the only exception was a sink that was behind pallets. Employees have been instructed to soak and clean rollers and trays in the self contained cleaning units, and use the sinks only for the final rinse. The drums for the self-contained cleaning units are moved to the Beckhart treatment system area, where the drum contents are treated.

We also reviewed the operations of the Beckhart treatment unit, including records of operation. We recommended that pH be added to the operations log, that a pH probe calibration log be developed, and that Beckhart should be contacted to verify that the current batch treatment protocol has been optimized. Nonetheless, it was clear that the Beckhart system operators have been conscientiously treating the wastewater and monitoring the discharge.

It was the consensus of Ohio EPA, Sebring, and MPI representatives that the copper violations probably were not due to discharges from the Beckhart treatment system, but due to incomplete cleaning of the rollers and trays prior to the final rinse in the shop area sinks. We discussed the need for better training and administrative controls to ensure that proper cleaning practices are used.

The flow limit in the IDP was also routinely violated. The Village of Sebring has calculated how much copper can be discharged to the WWTP without causing violations of their NPDES permit. The IDP contains a flow limit because one of the assumptions in this calculation was an MPI process wastewater flow of 1700 gpd. Mr. Oyer stated that there are two-three batch discharges from the Beckhart system each week, and each discharge is 300-400 gallons, which is below the permit limit and well below the reported flow values. We determined that the sampling location is after the sanitary wastewater combines with the process wastewater. Using established flow values, 175 employees would generate approximately 4375 gallons per day. We also determined that the reported flows were based on quarterly water use data provided by the Village, divided by the number of weeks (not days) in the reporting period. Because both Village water supply meters are readable and accessible, MPI must collect 24 hour flow data in order to determine daily average and maximum flow rates. MPI must discontinue the current method of reporting flows, and should report only values obtained from its meter readings. If flow data is not collected in a reporting week, the reporting code "AH" should be used.

We also discussed the current sampling procedures and reviewed the Chain of Custody (COC) forms. MPI has a contract laboratory conduct all sampling and analyses and file the eDMR. All of the COCs reviewed were incomplete, which would make the sampling

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data unusable in any type of legal action. MPI personnel were not sure if the sample was collected over a 24 hour period or over a seven day period, what type of preservatives were used, and when pH was recorded. They were also unsure about sampler tubing and collection jar cleaning. If the tubing and collection jar are not cleaned between uses, residue from previous samples can contaminate future samples. To be accurate and valid, pH analyses must be conducted within 15 minutes of sample collection. Samples must be properly preserved, and must be kept below 6° C. As the permittee, MPI Label Systems must ensure that sample collection and analyses conform with the requirements found in 40 CFR 136.

Please respond within 30 days of the receipt of this letter, documenting the response to the issues identified. 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: Lee Hatton, Village of Sebring
Ryan Laake, Ohio EPA, DSW, CO

ec: John Kwolek, Ohio EPA, DSW, NEDO

File: Pretreatment Industrial User/Permit-Compliance

Attachment 1 – Indirect Discharge Permit Limit Violations

Parameter	Limit Type	Limit	Reported Value	Violation Date
Copper, Total (Cu)	1D Conc	609	1010.	7/18/2007
Copper, Total (Cu)	1D Conc	609	5670.	7/25/2007
Copper, Total (Cu)	1D Conc	609	989.	7/2/2008
Copper, Total (Cu)	1D Conc	609	790.	5/6/2009
Copper, Total (Cu)	1D Conc	609	2010.	5/12/2009
Copper, Total (Cu)	1D Conc	609	816.	5/19/2009
Copper, Total (Cu)	1D Conc	609	673.	6/16/2009
Copper, Total (Cu)	1D Conc	609	8760.	7/7/2009
Copper, Total (Cu)	1D Conc	609	1160.	9/15/2009
Copper, Total (Cu)	1D Conc	609	750.	11/24/2009
Flow Rate	1D Conc	1700	5000.	12/6/2006
Flow Rate	1D Conc	1700	5000.	12/19/2006
Flow Rate	1D Conc	1700	5000.	12/26/2006
Flow Rate	1D Conc	1700	7387.	7/10/2007
Flow Rate	1D Conc	1700	7387.	7/18/2007
Flow Rate	1D Conc	1700	7387.	7/25/2007
Flow Rate	1D Conc	1700	3774.	1/9/2008
Flow Rate	1D Conc	1700	3774.	1/15/2008
Flow Rate	1D Conc	1700	3774.	1/23/2008
Flow Rate	1D Conc	1700	3774.	1/29/2008
Flow Rate	1D Conc	1700	9000.	7/2/2008
Flow Rate	1D Conc	1700	9000.	7/8/2008
Flow Rate	1D Conc	1700	9000.	7/15/2008
Flow Rate	1D Conc	1700	9000.	7/22/2008
Flow Rate	1D Conc	1700	9000.	7/30/2008
Flow Rate	1D Conc	1700	27000.	1/7/2009
Flow Rate	1D Conc	1700	27000.	1/13/2009
Flow Rate	1D Conc	1700	27000.	1/20/2009
Flow Rate	1D Conc	1700	27000.	1/27/2009
Flow Rate	1D Conc	1700	27000.	2/4/2009
Flow Rate	1D Conc	1700	33700.	2/10/2009
Flow Rate	1D Conc	1700	33700.	2/18/2009
Flow Rate	1D Conc	1700	33700.	2/24/2009
Flow Rate	1D Conc	1700	31500.	3/4/2009
Flow Rate	1D Conc	1700	31500.	3/10/2009
Flow Rate	1D Conc	1700	31500.	3/17/2009
Flow Rate	1D Conc	1700	31500.	3/24/2009
Flow Rate	1D Conc	1700	27000.	4/1/2009
Flow Rate	1D Conc	1700	27000.	4/8/2009
Flow Rate	1D Conc	1700	27000.	4/15/2009
Flow Rate	1D Conc	1700	27000.	4/21/2009
Flow Rate	1D Conc	1700	30050.	5/6/2009
Flow Rate	1D Conc	1700	30050.	5/12/2009

Parameter	Limit Type	Limit	Reported Value	Violation Date
Flow Rate	1D Conc	1700	30050.	5/19/2009
Flow Rate	1D Conc	1700	30050.	5/27/2009
Flow Rate	1D Conc	1700	21000.	6/3/2009
Flow Rate	1D Conc	1700	21000.	6/9/2009
Flow Rate	1D Conc	1700	21000.	6/16/2009
Flow Rate	1D Conc	1700	21000.	6/23/2009
Flow Rate	1D Conc	1700	6937.	7/7/2009
Flow Rate	1D Conc	1700	6937.	7/14/2009
Flow Rate	1D Conc	1700	6937.	7/21/2009
Flow Rate	1D Conc	1700	6937.	7/28/2009
Flow Rate	1D Conc	1700	6937.	8/5/2009
Flow Rate	1D Conc	1700	6937.	8/12/2009
Flow Rate	1D Conc	1700	6937.	8/18/2009
Flow Rate	1D Conc	1700	6937.	8/25/2009
Flow Rate	1D Conc	1700	6937.	9/2/2009
Flow Rate	1D Conc	1700	6937.	9/8/2009
Flow Rate	1D Conc	1700	6937.	9/15/2009
Flow Rate	1D Conc	1700	6937.	9/22/2009
Flow Rate	1D Conc	1700	6937.	9/29/2009
Flow Rate	1D Conc	1700	7583.	10/7/2009
Flow Rate	1D Conc	1700	7583.	10/13/2009
Flow Rate	1D Conc	1700	7583.	10/20/2009
Flow Rate	1D Conc	1700	7583.	10/27/2009
Flow Rate	1D Conc	1700	7583.	11/4/2009
Flow Rate	1D Conc	1700	7583.	11/10/2009
Flow Rate	1D Conc	1700	7583.	11/17/2009
Flow Rate	1D Conc	1700	7583.	11/24/2009
Flow Rate	1D Conc	1700	7583.	12/2/2009
Flow Rate	1D Conc	1700	7583.	12/8/2009
Flow Rate	1D Conc	1700	7583.	12/15/2009
Flow Rate	1D Conc	1700	7583.	12/22/2009
Zinc, Total (Zn)	1D Conc	2121	3410.	7/7/2009