



**Environmental
Protection Agency**

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

September 30, 2010

RE: RAYCO
3DP00045*AP
WOOSTER
WAYNE COUNTY

Mr. Kenny Koprivec
Paint Supervisor
RAYCO
4255 Lincoln Way East
Wooster, Ohio 44691-8601

Dear Mr. Koprivec:

On September 22, 2010 this writer conducted a compliance evaluation inspection of your facility. You represented RAYCO during the inspection. The visit consisted of a pre-meeting, NPDES Permit compliance review, and a physical inspection of the plant and wastewater pretreatment. The following represents a summary of the visit:

General

RAYCO is located at 4255 Lincoln Way East, Wooster, Wayne County. RAYCO manufactures stump grinders, brush chippers, forestry mulchers and horizontal grinders. Operations include cutting, welding, assembling and paint coating carbon steel. Sanitary and pretreated process wastewater is discharged to the sanitary sewers tributary to the City of Wooster WWTP. RAYCO maintains NPDES permit #3DP00045*AP which will expire on March 31, 2012. Process and potable water is supplied by an on-site well.

Process Producing Wastewater

Steel parts are prepped for powder coating using an iron phosphate cleaning line. Parts are first cleaned with a 10% solution of phosphoric acid, water rinsed, passed through an iron phosphate coating station, water rinsed again, and finally passed through a non chromic sealer station.

Wastewater Produced

- Continuous overflow from water rinse tanks
- Tank dumps from all five tanks described above
- Softener regeneration water

Process Wastewater Treatment

RAYCO received PTI No. 595515 on December 28, 2006 for the installation of pH adjustment facilities. Noted was that the equipment installed was transferred from

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RAYCO's previous location in Massillon, Ohio. Originally, periodic tank dumps from the five tanks was to be collected from the paint prep line in a "Dump Holding Tank". Overflows from the rinse tanks bypass around this tank. Gravity discharge from the "Dump Tank" and the constant water rinse were to enter a below grade reaction tank where the pH was monitored and adjusted with caustic (NaOH). You are operating the system somewhat differently than originally intended, which is acceptable to this office. Before dumping each tank, the pH is checked and adjusted prior to it being pumped and held in the "Dump Tank". There is no need to adjust the pH at the below grade reaction tank. Final discharge is monitored in a below grade vault located just outside the south wall of the building. Flow is measured using a Parshall Flume. The composite sample point is located in the upstream throat of the flume.

Inspection Observations

- The paint process is constant.
- Samples are taken with an automatic sampler by time weighted composite every hour during the time period when flow occurs from the "Dump Tank".
- The automatic sampler is not refrigerated. Samples are collected in one composite container and then individually poured into the supplied lab bottles and then refrigerated.
- The pH probe (EAKTON type) is calibrated once per two months with 4 and 7 buffers. The buffers had expiration dates of 2006 and 2008.
- The composite sample point in the Parshall Flume was laying in accumulated sediment.
- The Parshall Flume has not been calibrated since its installation in 2007.
- A trench drain surrounds the paint line and the treatment system. The drain leads to the below grade reaction tank. Any spills in this area would not be contained and would discharge to the sewer without treatment.

Compliance History

A review of your compliance history for the time period of April 1, 2007 through August 2010 did not reveal any numeric violations of your NPDES permit. However, the following frequency violations were noted:

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	001	Phosphorus, Total (P)	1/Month	1	0	07/01/2007
July 2007	001	pH, Minimum	1/Month	1	0	07/01/2007
July 2007	001	Cyanide, Total	1/Month	1	0	07/01/2007
July 2007	001	Chromium, Total (Cr)	1/Month	1	0	07/01/2007
July 2007	001	Copper, Total (Cu)	1/Month	1	0	07/01/2007
July 2007	001	Lead, Total (Pb)	1/Month	1	0	07/01/2007

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Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	001	Nickel, Total (Ni)	1/Month	1	0	07/01/2007
July 2007	001	Zinc, Total (Zn)	1/Month	1	0	07/01/2007
July 2007	001	Flow Rate	1/Month	1	0	07/01/2007
July 2007	001	Cadmium, Total (Cd)	1/Month	1	0	07/01/2007
July 2007	001	Silver, Total (Ag)	1/Month	1	0	07/01/2007

Action Items

- 1) The composite samples must be refrigerated during collection.
- 2) pH buffer solutions should be replaced once their expiration date is exceeded.
- 3) A written procedure should exist that specifies maintenance and calibration intervals for the pH meter and the flow meter. Written records should be maintained that documents when this done.
- 4) The flow meter should be cleaned and calibrated as soon as possible.
- 5) Some method of containment should be installed within the trench drain to prevent the release of any spills or accidental release of pollutants.

The above listed items must be adequately addressed in writing to this office no later than November 1, 2010. If you should have any questions or any of the above observations are inaccurate, feel free to contact this writer at (330) 963-1136 or by e-mail at phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt

cc: Lee Troyer, Pretreatment Coordinator, Wooster WWTP

File: Pretreatment