



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Hardin County
Triumph Thermal Systems, Inc.
NPDES Permit

June 16, 2009

Mr. Stanley Coughlin
Triumph Thermal Systems, Inc.
200 Railroad Street
Forest, Ohio 45843

Dear Mr. Coughlin:

On June 10, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at Triumph Thermal Systems, Inc. You, Mr. Lance Blackburn and Mr. Richard Bear were present and provided information on plant operations and maintenance. The inspection included an interview with completion of the enclosed inspection checklist, an overview of the manufacturing processes which generate wastewater, inspection of the wastewater treatment system and observation of each NPDES permitted outfall.

During our visit, the wastewater treatment system was in operation. The final effluent discharging to Rickenbach Ditch (a.k.a. Shaefer Ditch) via Outfall #002 was clear. The discharge from Outfall #003 was also clear. There was no discharge from Outfalls #001 or #005.

As we discussed, there have been eight NPDES permit effluent violations in the past year. You indicated that the three pH exceedances in December 2008 were believed to be a result of the pH meter drifting out of calibration. Upon calibration, the effluent was within the permitted range. Your response letter indicated that the meter is calibrated twice per month. We recommend that the meter be calibrated on a more frequent basis to ensure accurate readings. The remaining violations were for fluoride. You stated that Jones & Henry Engineers Ltd. have been hired to design wastewater treatment system improvements to meet final effluent limits for fluoride.

A review of our records also indicates that the Compliance Status Report outlined in Part I, C, (Schedule of Compliance) of your NPDES permit was due on February 1, 2009. No report was received. You stated that this report would be submitted in the near future. Please be aware that the Schedule of Compliance also requires submission of a Permit to Install application and detail plans, for achieving final effluent limits, no later than February 1, 2010.

Mr. Stanley Coughlin
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During the interview you stated that samples collected at Outfall #002 are not refrigerated during compositing. A tube sampler located in the final clarifier is used to collect composite samples. Samples must be refrigerated for proper preservation as required by the Code of Federal Regulations (40 CFR136.3). Please inform this office in writing as to the actions that will be taken to meet this requirement.

Our completed inspection report is enclosed for your records. If you have any questions, please call me at (419)373-3008.

Sincerely,



Thomas Poffenbarger, P.E.
District Engineer
Division of Surface Water

/lb

pc: ~~DSW/NWDO File w/enclosure~~

Permit #: 2IS00001
 NPDES #: OH0003701



State of Ohio Environmental Protection Agency
 Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2IS00001	OH0003701	6/10/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Triumph Thermal Systems, Inc. 200 Railroad Street Forest, Ohio 45843	9:30 AM	2/1/2008
	Exit Time	Permit Expiration Date
	10:30 AM	1/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Stanley Coughlin, Director - Manufacturing Support Mr. Lance Blackburn, Maintenance Supervisor	419-273-1110 419-273-1122	
Name, Address and Title of Responsible Official	Phone Number	
Mr Stanley Coughlin, Director - Manufacturing Support Triumph Thermal Systems, Inc. 200 Railroad Street Forest, Ohio 45843	419-273-2511	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment	
<input type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Compliance Schedule	
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input checked="" type="checkbox"/> Other	
<input checked="" type="checkbox"/> Collection System			

Section D: Summary of Findings (Attach additional sheets if necessary)

Discharge from Outfalls 002 and 003 was clear. There was no discharge from Outfalls 001 or 005.

There have been eight NPDES permit effluent violations in the past year.

Compliance status report (due February 1, 2009) was not submitted.

Samples must be refrigerated (at 4°C) during compositing for proper preservation per 40 CFR 136.3.

Inspector	Reviewer
<i>Thomas Pofflanger</i> 6/12/09	<i>Elizabeth A. Wick</i>
Thomas Poffenbarger, P.E. Date District Engineer Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Date Water Quality Engineer Division of Surface Water Northwest District Office

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a)Hex. Chrom. (Nov 07); Fluoride (Nov. 07, Oct. 08, Dec. 08, Mar. 09); pH (Dec. 08)

(b) Jones & Henry Engineers have been hired to complete a study to meet final effluent limits for fluoride. pH violations are believed to be caused by insufficient calibration.

(e)Status Report due on February 2009 was not received.
PTI application is due February 1, 2010.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N/A
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained.... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... N/A
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N/A
- (d) Log book contains the following:
 - I. Identification of treatment works..... N/A
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/A
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N/A
 - IV. Laboratory results (unless documented on bench sheets)... N/A
 - V. Identification of person making log entries..... N/A
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A

- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... Y
(Method:ahuled offsite as a hazardous waste)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name:Chemtron)
- (f) Has amount of sludge generated changed significantly since
last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/A
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)

- (b) Calibration frequency adequate Y
(Date of last calibration: 3/4/2009)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (cont)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... N
 - (i) Samples refrigerated during compositing..... N
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... Y
 - (c) Analyses being performed more frequently than required by permit. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: All parameters except pH.

Lab name: Alloway Environmental Testing

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
002	none	none	clear	none	none	clear	
003	none	none	clear	none	none	clear	

Comments/Status:

There was no discharge from Outfalls 001 or 005.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:
 (1) What is the cause of the condition?
 (2) Is the observed condition or source a waste product?
 (3) Where is the suspected contaminant normally disposed?
 (4) Is this disposal permitted?
 (5) How long has the condition existed and when did it begin?

Comments/Status: