



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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: Notice of Violation
Henry County
UMC Wadewater Retreat and Ministry Center
NPDES

October 1, 2008

Mr. Eric Witte, Director/Manager
Wadewater Retreat and Ministry
4050 U.S. Highway 24
Liberty Center, Ohio 43532

Dear Mr. Witte:

On September 23, 2008, an NPDES compliance inspection was conducted at the Wadewater Retreat and Ministry Center. You were present and provided operation and maintenance information regarding the three celled controlled discharge lagoon system, which was constructed in 1993. Wadewater Retreat and Ministry Center currently has a National Pollutant Discharge Elimination System (NPDES) Permit (number 2PR00067). The inspection included a tour of the wastewater treatment facility.

The first and second lagoons were partially covered in duck weed. The contents of the third lagoon were a brownish green color with suspended solids from the algae growth.

As you stated, the facility is used on the weekends through out the year averaging 30-80 visitors. During the summer there are weekly camps that car reach a peak of 129 visitors. There are 30 beds on site. There is also a swimming pool that averages 1500 gallons of backwash wastewater 112 weeks of the year. At present, it appears inflow and infiltration are not a problem at this facility.

The valves are not functioning properly. Therefore, wastewater is being pumped between the lagoons. During our inspection, a 5 gallon gasoline container had been left on the embankment between lagoon #1 and #2.

On August 2, 2007 this facility was inspected by Nush Courlas and she noted several issues that needed to be resolved.

Mr. Eric Witte
October 1, 2008
Page Two

Vegetation has been removed from around the facility. Currently, there are no trees and everything has been mowed. However, the embankments around the lagoons continue to be covered in vegetation so thick that the stone is not visible.

The embankments have severe damage from animal activity which has compromised the embankment located between Lagoons A and B. You mentioned that you have received quotes regarding the repair of the lagoon liner. I recommended that you provide specifications to the contractors bidding on this work. Since the damage from the animals is so extensive your engineer may need to add language to these specifications which details cutting back the liner in areas where the animals have burrowed. It is vital that the integrity of the liner be reconstructed to ensure that wastewater does not leach out of the lagoon and contaminate the ground water.

When the lagoons are emptied to complete the work on the embankments, you should consider removing and disposing of the sludge in the lagoons. For information on disposal options and permitting requirements, please contact Mr. Andrew Gall, Ohio EPA NWDO Division of Surface Water (419)373-3003.

During this inspection, we saw that the facility was discharging from station 001 into an unnamed tributary of the Maumee River when the flow in the stream was stagnant. You are in violation of Part II, H of your NPDES permit, which states:

Controlled discharge flows shall be limited to not more than 90 gallons per minute (gpm) for each cubic foot per second (cfs) stream flow measured upstream of the plant final effluent. ...

On September 24, 2008, I spoke with your operator Mr. Frank Godwin. Mr. Godwin stated that he had spoke with me in July concerning this discharge and received our approval for discharging storm water from lagoon #3. I agreed that a purely storm water discharge from lagoon #3 would be allowable however, as soon as wastewater was pumped from lagoon #2 into lagoon #3 the weekend of September 13th and 20th, the NPDES permit should have been followed.

The discharge to the stream did not appear to have any solids, algae growth or discoloration. Some foam was collecting in the stream.

Mr. Eric Witte
October 1, 2008
Page Three

We suggest that you speak with your engineer regarding the installation of a stream water level gauge that may assist your determination if the flow in the stream is sufficient for discharge of your effluent.

As we discussed on September 24, 2008, samples were taken to document the condition of the wastewater during this discharge. Please submit documentation of these sampling results to our office.

If you have any questions, please contact me at (419)373-3067.

Sincerely,


Dana Martin-Hayden
Division of Surface Water

/lb

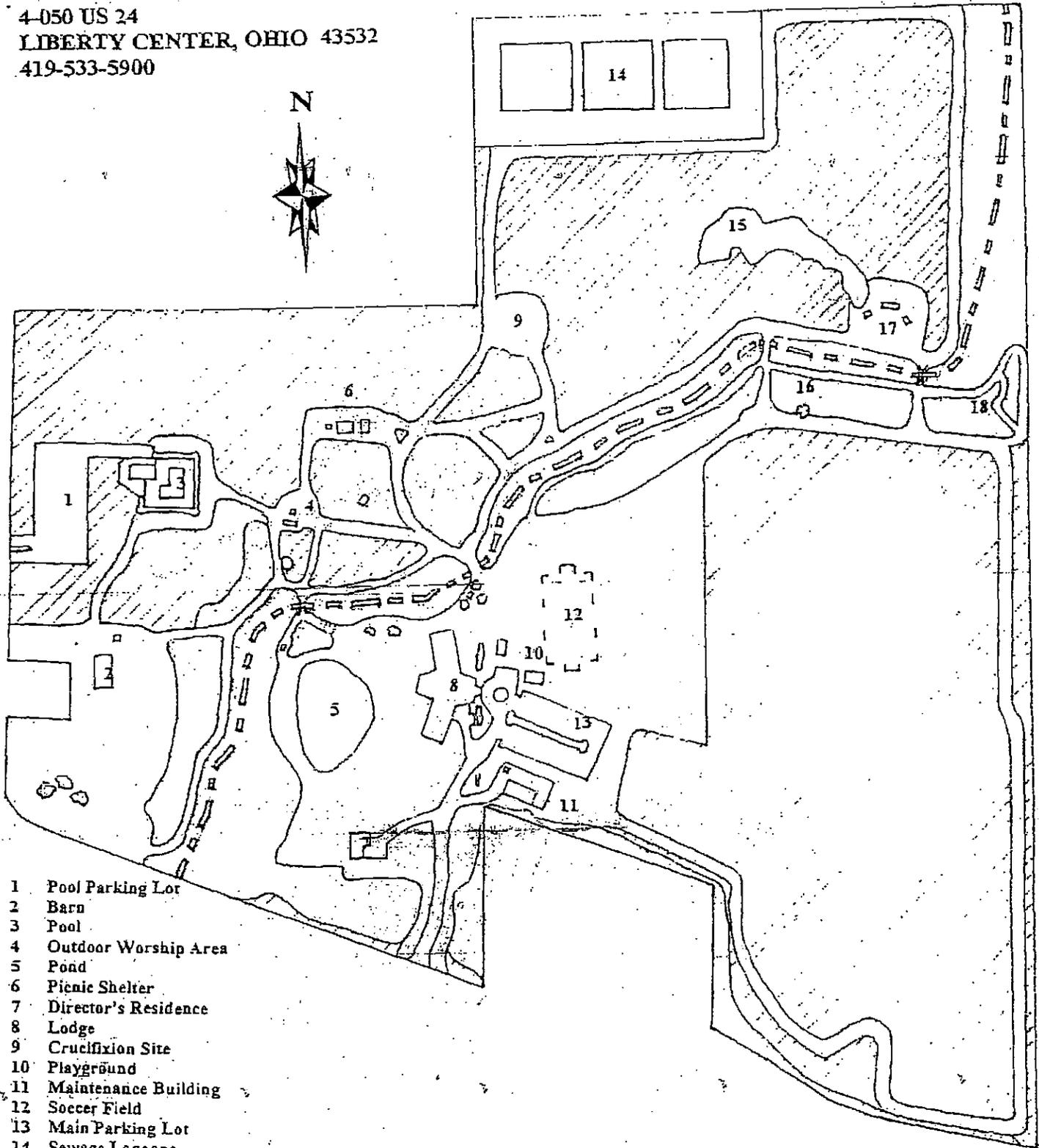
pc: ~~INWDO File~~

WIDEWATER RETREAT & MINISTRY CENTER

4-050 US 24

LIBERTY CENTER, OHIO 43532

419-533-5900



- 1 Pool Parking Lot
- 2 Barn
- 3 Pool
- 4 Outdoor Worship Area
- 5 Pond
- 6 Picnic Shelter
- 7 Director's Residence
- 8 Lodge
- 9 Crucifixion Site
- 10 Playground
- 11 Maintenance Building
- 12 Soccer Field
- 13 Main Parking Lot
- 14 Sewage Lagoons
- 15 Dunes
- 16 Signal Tree
- 17 Archery Range
- 18 Challenge Course

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
<u>2PR00067</u>	<u>OH011252</u>	<u>08/09/23</u>	<u>C</u>	<u>S</u>	<u>2</u>

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
United Methodist Widewater Retreat 4050 US 24 Liberty Center, OH 458	2:30 PM	August 1, 2003
	Exit Time	Permit Expiration Date
	4:00 PM	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Frank Godwin, Operator	419-533-5901
Eric Witte, Director/Manager	419-533-5900

Name, Address and Title of Responsible Official	Phone Number
Eric Witte 4050 US 24 Liberty Center, Ohio 43532	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>NA</u> Laboratory	<u>S</u> Compliance Schedules
<u>U</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

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

May need to add Chlorine residual sampling to the final effluent due to Swimming Pool Effluent

Although the maintenance efforts related to vegetation has improved, the liner has not been repaired and the vegetation and animal damage remains heavy on the embankments.

They were discharging wastewater when the stream was not flowing and no samples being taken during the discharge. Violation of Part II, H of the NPDES permit.

Dana Martin-Hayden 10/1/05
 Name(s) and Signature(s) of Inspector(s) Date, Ohio EPA, Northwest District Office

Elizabeth A. Wick, P.E.
 Name and Signature of Reviewer Date, Ohio EPA, Northwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Commercial Pandora Manufacturing**

Date of inspection: 9/16/08

OH Number: NA

IDP Number: NA

Facility Representative:

Ralph Whetzel, VP
Carolyn Ruh-Kagy
Dave Kidd, (Blending area #1)
Grant Durenberger (Blending area #2)

Inspector(s): Dana Martin-Hayden, DSW
Paul Chad, DAPC
Wendy Miller, DHAZM
Lynette Habilitzel, DSW

COMPLIANCE

1. Date of last pretreatment inspection: NA
2. Has the facility been in compliance with its permit limits since the last inspection?
If no, explain: NA
3. Is the facility in compliance with all other requirements?
Sampling procedures NA
Reporting (late reporting, failure to report, etc) NA
Compliance schedules NA
Submitted BMR and 90 day compliance reports NA
Any other requirements NA

If any of the above five answers is no, explain:
4. Was the facility required to perform any actions as a result of the last inspection?
Explain any unresolved actions:

In 2006, the facility had a fire, due to a spark on one of the flammable fill lines. The facility has submitted and received a general storm water permit. They have investigated the possibility of discharging rinse wastewater from the blending tanks to the Village of Pandora WWTP, a lagoon system. From testing done on the wastewater stream it was determined by the Village of Pandora that a discharge to the WWTP would be infeasible at the present and possibly into the future. The facility eliminated a pit area that had discharged wastewater to Riley Creek in the past. Wastewater has been hauled off site. An evaporator was investigated and installed in 2007 after consultation with Ohio EPA DAPC.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 55
6. Shifts/Day: 1
7. Production Days/Year: ~250
8. Hours/shift: 8
9. Any production changes since the last inspection?
If yes, explain: Y

Prior to the fire in 2006 they did blend and package flammable products (brake fluid and fuel additives). Now they only do combustible blending and packaging no more flammable products. They used to have one large account (75% of their production) which was primarily flammable product. Now they have diversified and have several different accounts. This is the first week they are blending and packaging a new line of cleaners.

10. General facility description and operations:

The facility consists of three separate blending areas. Blending Area #1 does the aqueous products (hydrogen peroxide, window cleaner, glass clean, all purpose cleaner) and the blending tanks are hard piped to Lines 6-8. Wastewater from the cleaning of these tanks is collected in totes (avg 1/wk) and taken to blending area #3. At this location the wastewater is placed in drums and shipped off site for treatment.

Blending area #2 mixes the combustible products. Fuels, which are combustible and are located outside of the facility in a retention pond, are hard piped into the batch tanks located in blending area #2. The product is hard piped to lines 1-5 for packaging. The tanks are dedicated to specific products that do not change much in composition from the base and therefore they are not cleaned in between each batch. They package the entire contents of these tanks before changing products. The tanks are only cleaned if they discontinue or change a product. Wastewater generated from this area would be shipped off as hazardous waste. However, they rarely change the use of these tanks due to expense of cleanup. They have a company come in to clean the heels out of the tanks when needed, which has not been recently.

Blending area #3 is used for the PADCO products, which are chemical products specifically blended for chrome plating operations. Tanks CR #1-4 in this area are for preparations of chromate mixtures that are packaged in drums and shipped off site. Nonhazardous tanks #1-9 are cleaning solutions (sodium hydroxide, potassium hydroxide and sillicates) used in chrome plating operations, which are blended, packaged in drums and shipped off site. Chrome tanks #1-4 are cleaned with water and the water is stored in drums and recycled for cleaning as much as possible until the solution is then shipped off site for treatment. Nonhazardous tanks #1-9 are cleaned with water and sometimes surfactants, NaOH, and brushes. The wastewater is drained to a dedicated recycled water pipe line which drains to the reservoir tank, which is then pumped into the holding tank and finally hard piped to the evaporator for disposal. Other slop tank water that is generated from cleaning these tanks is discharged to a rubber lined wet well which is pumped to the holding tank. The wet well also has a hand washing sink drain discharging into it. The waste water from this wet well also discharges to the holding tank. The reservoir tank has a float in it which causes the evaporator to shut off when the wastewater level in the tanks is too low.

Water is filtered on site by a reverse osmosis system. The RO Reject water is pumped to a sanitary sewer line outside of the evaporator room.

The Evaporator room has several floor drains which discharge to a wet well located in the same room. The wet well is pumped when wastewater is shipped of site for disposal.

11. Any change in materials used in production since the last inspection? (Since the Fire in 2006) Y
 If yes, explain:

They have increased production of water based products, including peroxides, cleaning products, automotive (stop leaks, no brake fluid). They sell to vendors that put their name on the product (products do not go to retail). They no longer have as many combustible materials on site. They still produce products for the plating industry in their PADCO blending area #3 5 days a week. (Chromate blending) They have the same chemicals on site, however, in a smaller quantity.

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

Before the fire they were producing \$18 Million a year and since the fire they have reduced to \$10 Million a year and hit \$8 Million in 2007. Some of this decline is due to the fire and the rest is due to the slow down in the economy, which has been pronounced in the auto industry (a key costumer). They do not anticipate an increase in production.

WASTEWATER TREATMENT

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

Please see the attached drawing.

14. Was a PTI issued for the treatment system? N

After the fire/explosion, the facility was collecting and hauling rinse waste water off site. No PTI was needed. Now that they have installed a wastewater evaporator they do need to submit a PTI application.

15. Were there any modifications to the treatment system since the previous inspection? Y

WASTEWATER TREATMENT CONTINUED

The facility contacted DAPC in 2006 regarding the installation of an evaporator. Since a Permit to Install (PTI) is required for all wastewater treatment systems, including evaporators, you will need to submit an PTI application for the evaporator which includes the sump in the blending area, the reservoir, the holding tank, evaporator and the sump in the evaporator room.

If yes, was a PTI obtained? N

PTI Number: *Need a PTI* Date:

16. What is the treatment mode of operation? Batch

If batch, list the frequency and duration:

Once a day the evaporator is checked by maintenance and filled with water from the holding tank. The evaporator shuts off if a float in the holding tank is too low. The unit runs 5 days a week for 24 hours a day.

17. Who is responsible for operating the treatment system?

Jim McCrate, who was on sick leave during our inspection.

18. How often is the treatment system checked?

Daily by the Maintenance crew to check temperature and feed in the wastewater. They also clean the unit weekly. Operators stated they run the unit as much as possible to prevent it from cooling because clean up of the unit is much harder after it has ceased running and has cooled down. They clean the unit weekly and usually generate 3-4 drums of sludge. The sludge has tested hazardous, positive for corrosivity. They sometimes get a skim on the evaporator and they are not sure what products this relates too.

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

The evaporator shuts off if a float in the holding tank is too low. The unit runs 5 days a week for 24 hours a day. The evaporator has 4 probes to measure water level in the tank. If one of the probes does not detect the wastewater the evaporator unit shuts off.

20. Is there an operations and maintenance manual? Y

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

22. Are there any bypasses in the system? Y
If yes, describe the location:

If the evaporator unit is down for a day or so they will ship the wastewater from the holding tank off site for disposal.

Have bypasses occurred since the last inspection? NA

Was the POTW notified? NA

23. Are residuals or sludges generated? Y
Will provide this information
Method of disposal:

Sludge hauled off by Transvac Corp/Interdyne was determined to be hazardous by a corrosivity test. You needed to check if metals had triggered a redetermination of other sludge drums that were hauled off site. Please provide the metals fingerprint that was run on this sludge in the past and research your QA/QC records to verify the sample as representative. This summarizes the receipts you provided during the inspection regarding the rinse wastewater. 9/26/07 Vaccum totes containing water and solids, 6/27/08 wastewater corrosive liquid 5500gallons. (originally shipped out as wastewater & Oil on 6/27/08 and then reclassified)

Frequency and amount of disposal:
They generate 3 to 4 drums per week of sludge.

Name of hauler/landfill/disposal facility:
Transvac Corp/Interdyne

Is any sludge generated subject to RCRA regulations? Y
Some of it has been.

If land applying sludge, is there a sludge management plan? NA

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	(Haz) / WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
Evaporator Suldge	Disposal Drums				
Holding Tank Rinse Wastewater Is hard piped to the Evaporator	Tanker				
Chromate Tank Rinse Wastewater Recycled often before shipment Off-site	Disposal Drums				
Rinse Wastewater Storage Totes pumped to holding tank or shipped off site for disposal.	Tanker				
Total Regulated Process Flow					
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis	None				
Demineralizer Regeneration					
Softener Backwash					
Filter Backwash					
Compressor Condensate	None				
Storm water	Need Plan				
Total of Dilute Flows					
Unregulated Flows					
Sanitary					
TOTAL FLOW					

Reverse Osmosis water and Sanitary Wastewater have been discharged to the WWTP since the fire. This method of disposal was approved by Ohio EPA. The RO reject water discharged to the sanitary sewer line is located outside of the evaporator area.

Air compressor Condensate discharges to wet well in Evaporator room.

PROCESS AND WASTEWATER INFORMATION CONTINUED

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

Storm water discharges to Riley creek. Sanitary wastewater and RO reject wastewater discharges to the Pandora WWTP.

SELF MONITORING

26. Sample location(s) described in the facility's permit:

Sampling to determine waste stream properties has been done in the past however they have not documented well how representative the sample is of current and average operations. After they have reviewed their records they will determine if previous sampling data reflects current and predicted operations. During the PTI issuance process a more representative sample of current and predicted operations may be requested of the evaporator wastewater and the sludge generated.

27. Is the facility sampling at the location(s) described in the permit? NA
If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? See # 26.
If no, indicate a representative location:

29. Is the flow measured or estimated? N

A new wastewater generation log will help document the amount of wastewater treated or a separate log should be kept at the evaporator by the maintenance personnel to document how much wastewater is added daily to the unit.

If measured, how often is the meter calibrated? NA

If estimated, describe method of estimation:

30. Is pH monitored continuously? N

If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? N
If no, specify the sample collector:

SELF MONITORING CONTINUED

32. Are appropriate sampling procedures followed? N
Monitoring frequencies NA
Sample collection (grab for pH, O&G, CN, phenols, VOCs) NA
Flow proportioned samples NA
Proper preservation techniques Y
Sample holding times Y
Chain-of-custody forms Y
33. Are samples analyzed in accordance with 40 CFR 136? Y
34. Laboratory conducting analyses:

Alloway sampled the wastewater stream while TransVac Corp./Interdyne did the sludge from the evaporator.

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? NA
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? NA
If yes, is it being implemented? NA
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y

The facility has an SIC code that requires a Storm Water Management Plan. A component of the Storm Water Management Plan is a Control and Counter Measure Plan (SPCC), which is a requirement of the Federal SPCC Regs. No plan was present during our inspection. Specifically, the plan did not detail were the laboratory drain discharges. Since my last visit two spill containment pads have been added for truck loading and unloading. Jim McCrate supervises when the storm water is pumped and hauled from these unloading pads and when it is pumped to the parking area.

If yes, does the facility have a written plan? Y for the SPCC but the Storm Water Management Plan was not available on-site during our inspections.

39. Identify any potential slug load or spill areas:

Several are identified in the SPCC plan. The laboratory area was included, however, the destination of the discharge was not noted. The old blending pit, which is located in blending area 1, has been filled in and the RO unit floor drain has been filled in.

REQUIRED FOLLOW-UP ACTIONS

Please send to our office and my attention the following information:

Copy of the Storm Water Management Plan needs to be submitted to our office. The plan must contain accurate descriptions of potential slug spill areas, sampling procedures and training details.

Create a new log to document what specific rinse wastewater was added to the holding tank and when.

REQUIRED FOLLOW-UP ACTIONS CONTINUED

Copy of the finger print of the evaporator raw wastewater and an estimate from Carolyn if the wastewater sample should be representative of current operations after reviewing the log. This assessment of representativeness also applies to the metals analysis that was completed by Transvac Corp./Interdyne who hauls the evaporator sludge off site.

Copy of the water usage data from the Village of Pandora for the facility.

PTI Application Submittal

An evaporator seems to be an acceptable option for wastewater treatment provided the data we have received is representative of current and predicted operation. Using the provided data in 2006, air emissions were determined to be de minimis by the Ohio EPA DAPC. DHWM will need to verify data if the data is representative, which could affect sampling parameters and frequency. Consideration of installation of an alarm system for the evaporator should be included in the PTI, this could satisfy the issues related to operation when the facility is not staffed.

Make a Log

Documentation will be kept to verify which rinse water is sent to the holding tank and when. From our interviews of all operators in the blending area number 3 it was determined that the operators were aware that wastewater from the chromate tanks was not allowed to drain into the holding tank. Some test results of the holding tank wastewater which was shipped off site indicate that chrome does exist in this waste stream. Ms. Ruh-Kagy stated that chrome may be present due to a hand washing station that discharges into the rubber coated wet well next to the nonhazardous blending tanks. Discussions included setting up a hand washing station that would not discharge into the holding tanks.

Future Action anticipated on site

The air stripper on site, which treats contaminated ground water, was operating during our visit. We were informed that the previous owner, who runs the air stripper, will be removing the contaminated soil and replacing the soil with clean soil that has a biological in-situ treatment component on the southeast side of the building.