



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

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

April 30, 2008

Judy Sanders
Orbis Corporation
200 Elm Street
Urbana, Ohio 43078

RE: Orbis Corporation Reconnaissance Inspection.

Dear Ms. Sanders:

On April 10, 2008 a representative of the Ohio EPA (Mr. Joe Reynolds) conducted a Reconnaissance Inspection at the Orbis facility, 200 Elm Street, Urbana. The inspection was conducted as part of the National Pollutant Discharge Elimination System (NPDES) permit renewal process for the facility.

The inspection report is attached. There are six items that require a response. The response dates are noted in the report. You will be receiving a draft NPDES permit (the renewal permit will remain draft for a period of 30 day to allow for public comment) later this summer. If you have questions, comments, or correction concerning the draft, you should contact the district (Joe Reynolds, 937 285 – 6097) during the 30 day comment period.

If you have any questions regarding the report, please feel free to contact Mr. Reynolds at the number above.

Sincerely,

Martyn Burt, Environmental Supervisor
Division of Surface Water

cc: Kelly Hurley, Env. Health and Safety Coordinator
Tony Bowles, Maintenance Engineer



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

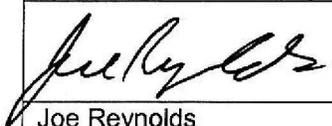
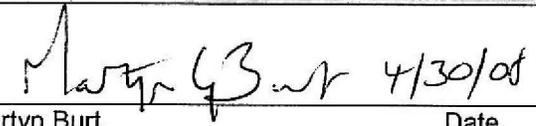
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IN00093*GD	OH0049972	4/10/2008	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Orbis Corporation 200 Elm Street Urbana, Ohio 43078	9:15 AM	10/1/2003
	Exit Time	Permit Expiration Date
	11:00 AM	9/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Kelly Hurley, Env. Health and Safety Coordinator Tony Bowles, Maintenance Engineer	(937) 652 - 1361 ext. 115 Fax (937) 484 - 4375	
Name, Address and Title of Responsible Official	Phone Number	
Judy Sanders 200 Elm Street Urbana, Ohio 43078		

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

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

See attached report.

Inspector	Reviewer
 Joe Reynolds Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4/30/08 Date	4/30/08 Date

Inspection Findings

Orbis Corporation was issued National Pollutant Discharge Elimination System (NPDES) permit number 11N00093*GD on September 8, 2003. This permit expires September 30, 2008. At the time of this inspection an NPDES renewal application had not been submitted.

Orbis Corporation discharges non-contact cooling water and storm water through outfall 001 to a storm sewer that ultimately discharges to Dugan Run. The permit also contains two storm water only outfalls, 002 and 003.

All of the indoor drains (except for the non-contact cooling water drains) go to the City of Urbana sanitary sewer. These drains are used to collect sanitary waste water and blow down water.

Orbis directs non-contact cooling water from two separate drains to a city storm sewer east of the facility. Down spouts from the facility are also tied to this drain. There are no air pollution control devices on the roof. There are storm water sources upstream of sampling point 001 that are not associated with Orbis.

Acid is added to the cooling towers to control scale build-up. Conductivity sensors and pH sensors are used to control the feed rate.

Flows are estimated based on pump run times. An hour meter is used to record total run time.

Orbis has not updated their Storm Water Pollution Prevention Plan (SWPPP) to reflect current personnel changes and operations. The plan is not currently being implemented. On-site representatives were unaware of the locations for outfalls 002 and 003.

Screens were placed on the storm sewer inlets at the facility. Plastic beads and lids were noted on the screens by the railroad track unloading area (east side of building).

Orbis has experienced problems in the collection and storage of final effluent sampling data. In 2002/2003 temperature and pH violations were attributed to faulty sampling equipment. In 2006 computer software storage issues contributed to lost data and sampling frequency violations. In 2007 a monitoring computer power failure contributed to a loss of sampling data. At this same time the pH monitoring system was found to be defective (probe failure).

A review of final effluent sampling data from January 1, 2006 to February 29, 2008 revealed the following final effluent violations: 45 pH limitation violations, 1 pH frequency violation, 18 temperature frequency violations, and 18 flow frequency violations.

Items Requiring a Response

1. An NPDES renewal application Form 1 and 2C must be submitted to this office as soon as possible. This application must be received by no later than ~~May 9, 2008.~~ *May 27, 2008*
2. Orbis must perform a feasibility and cost study for the establishment of a new 001 sampling location. The new station must allow Orbis to obtain representative samples from the non-contact cooling water system while eliminating possible interferences from extraneous contamination sources. The results of this study must be submitted to the Ohio EPA by no later than July 14, 2008.
3. A sampling equipment operations and maintenance plan must be developed for all monitoring equipment being used to document NPDES permit compliance. The plan must be designed to insure this equipment remains in service and is recording accurate information. At a minimum the plan must address routine maintenance, equipment calibration, quality assurance checks, and back-up monitoring and recording systems. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
4. In order to provide a better estimate of actual non-contact cooling water flows being discharged, an effluent flow metering systems must be established on the non-contact cooling water effluent lines. A Permit to Install application and detailed plans for the flow monitoring system must be submitted to the Ohio EPA by no later than July 14, 2008.
5. An updated Storm Water Pollution Prevention Plan which reflects current conditions and practices must be submitted to this office. As part of this plan a site map which identifies all storm water discharge locations must be developed. The exact location (including Latitude and longitude locations) of outfalls 002 and 003 must be identified. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
6. All residual materials that collect on the storm screens must be removed on a regular basis to ensure that they do not enter the storm system. Regular inspections of all storm water controls and discharge locations should be performed as part of the storm water program. A copy of the storm water inspection sheets from the last 6 months must be submitted to the Ohio EPA by no later than May 9, 2008 (if available).

Encl (1)



State of Ohio Environmental Protection Agency

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OHIO EPA

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April 30, 2008

Judy Sanders
Orbis Corporation
200 Elm Street
Urbana, Ohio 43078

Bruce Mapes
Plant Manager

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Urbana, OH 43078 USA
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Swenson

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Sincerely,

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Division of Surface Water

cc: Kelly Hurley, Env. Health and Safety Coordinator
Tony Bowles, Maintenance Engineer

consulting
→ Eric Swenson
(937) 869-4786



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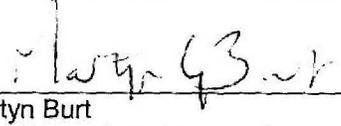
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