



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 12, 2012

Re: Pretreatment
ABC Manufacturing Company
Village of McConnellsville
Complaint Inspection
Certified Mail 70102780000197044893

Mr. Wade Benjamin, President
ABC Manufacturing Company
210 13th Street
Malta, Ohio 43758

Dear Mr. Benjamin:

On September 11, 2012, I inspected ABC Manufacturing. The purpose of the inspection was to determine the facility's compliance with federal and state water pollution control laws. Tim Benjamin, Supervisor of Powder Coating, represented ABC Manufacturing during the inspection.

General Facility Description:

ABC Manufacturing produces aluminum and steel window and door frames and fabricated metal products. Operations include a three stage washer for preparing metal parts for powder coating. The stages include combined iron phosphating and detergent cleaning in stage 1, and rinses in stage 2 and stage 3. Wastewaters generated by the three stage washer are subject to Metal Finishing Point Source Categorical Standards, 40 CFR 433.17. The company began operation of the three stage washer in May, 2009.

Current employment was reported as 35, with 4 ten hour production shifts per week. It was reported that there is currently no regular overflow from the 3 stage washer system. All three stages of the washer are currently plumbed to a drain pipe leading to the area where wastewater is stored in drums and totes. The pipe was capped at the time of the inspection.

Records indicate that ABC contracted with Zemba Brothers to haul wastewater off site to Suburban Landfill for stabilization. Records show 1935 gallons were disposed in 2010 and 8300 gallons in 2011. The most recent shipment on record occurred on November 17, 2011. Waste Management reported that ABC's waste profile was inactive as of May 24, 2012. Approximately 4000 gallons of wastewater was in storage at the facility at the time of the inspection.

Required Actions:

1. ABC Manufacturing must comply with ORC 6111. ABC Company should not discharge its process wastewater to the ground, waters of the state or sanitary sewer without obtaining required permits and approvals from Ohio EPA. All wastewaters should be disposed of in compliance with federal, state and local laws. Please provide copies of manifests to Ohio EPA at the time of shipments for all future off-site disposal of

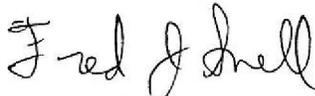
wastewater, and retain complete documentation for the date, method and quantity of disposal of any wastewater disposed in your files.

2. I observed approximately 4000 gallons of wastewater in storage at the time of the inspection. The wastewater was stored in five 300 gallon totes, two 250 gallon totes, and thirty-eight 55 gallon drums. There had been roughly 6000 gallons in storage on May 2, 2012. The wastewater had been stored in five 300 gallon totes, five 250 gallon totes, and thirty 55 gallon drums. The Village of McConnelsville received 250 gallons of wastewater at the Hawk National Guard base on June 11, 12 and 18 of 2012. Tim Benjamin stated that no wastewater had been disposed other than what was taken to the Hawk treatment plant. However, approximately 1200 gallons of wastewater that had been on site on May 2 had been removed from the facility with no documentation and no explanation of the destination. If additional wastewaters were generated at an estimated 500 gallons per month, up to 3200 gallons was disposed since May 2. Please inform Ohio EPA how all wastewater was disposed between May 2 and September 11. Please be advised that ORC 6111.99 provides for civil or criminal penalties of up to \$25,000 per violation per day for violation of ORC 6111.04. CWA Section 1319 provides for penalties of up to \$25,000 per day of violation and imprisonment for up to one year for willful or negligent violations of several sections of the Clean Water Act, including Section 1318, which addresses accurate recordkeeping and reporting to regulatory authorities.

Ohio EPA may consider enforcement action pursuant to the Ohio Revised Code Chapter 6111 based on the violations identified during the inspections conducted on November 19, 2009 and May 2, 2012, and ABC's future actions in response to this letter.

Please respond to this letter, in writing, within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

- c: John Thompson, Village Administrator, Village of McConnelsville
- c: Pretreatment Unit, DSW, CO
- c: Scott Foster, DSW, SEDO
- c: Elizabeth Herron, DMWM, SEDO
- c: Miki Mercer, DAPC, SEDO



State of Ohio Environmental Protection Agency
Southeast District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
OPB00025*	OH0021466	September 11, 2012	3	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
ABC Manufacturing Company 244 13 th Street, P.O. Box 369 Malta, Ohio 43758		10:30 a.m.	N/A
		Exit Time	Permit Expiration Date
		12:00 p.m.	
Name(s) and Title(s) of On-Site Representative(s)		Phone Number(s)	
Tim Benjamin, Supervisor of Powder Coating		(740) 962-9003	
Name, Address, and Title of Responsible Official		Phone Number	
Wade Benjamin, President		(740) 962-9003	

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

Section D: Summary of Findings (attach additional sheets if necessary)			
See attached letter.			
Inspector		Reviewer	
<i>Fred J. Snell</i>		<i>Jennifer M. Witte</i>	
Fred J. Snell		Jennifer M. Witte	
Division of Surface Water		Compliance & Enforcement Supervisor	
Southeast District Office		Division of Surface Water	
Date		Date	
10/11/12		10/11/12	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery Buddy Sims 10/15/12</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Wade Benjamin, President ABC Manufacturing Co. 210 13th Street Malta, OH 43758</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7010 2780 0001 9704 4893</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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Sent to: Wade Benjamin, ABC Manuf. Co.
Street, Apt. No., or PO Box No.: 210 13th Street
City, State, ZIP+4: Malta, OH 43758

PS Form 3800, August 2006 See Reverse for Instructions

7010 2780 0001 9704 4893