



**Environmental
Protection Agency**

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

September 7, 2011

Matt Kress, Director of Operations
2455 Dayton-Xenia Road
Dayton, OH 45434-7199

RE: Unison Industries LLC Plant 2, NPDES Permit No. O0109177/ OEPA
Permit No. 1IN00140*BD

Mr. Kress:

On August 24, 2011 Mike Zimmerman and I conducted an NPDES Compliance Evaluation Inspection at Unison Industries LLC Plant 2. Chad McOmer, Unison – EHS Manager, Emily Cull, Unison – EHS Specialist, and Garrett Crist, Consultant – Crown Solutions, were present for the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

A copy of the Compliance Evaluation Inspection report is enclosed. Most areas evaluated received "Satisfactory" ratings. "Flow Measurement" received marginal ratings due to lack of calibration of the flow meters.

Please see the attached report for details

If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,

Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

Cc: Chad McOmer, Unison Industries



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
11N00140*BD	OH0109177	8/24/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Unison Industries 530 South Orchard Lane Alpha, Ohio 45301	9:30AM	11/1/2006
	Exit Time	Permit Expiration Date
	10:30AM	10/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Chad McOمبر, EHS Manager	(937) 490-7162	
Garrett Crist - Consultant with Crown Solutions	(937) 657-0926	
Emily Cull - EHS Specialist	(937) 469-1237	
Name, Address and Title of Responsible Official	Phone Number	
Matt Kress, Director of Operations 2455 Dayton-Xenia Road Dayton, OH 45434-7199	(937) 490- 7110	

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

Section D: Summary of Findings (Attach additional sheets if necessary)			
See attached report. Please pay particular attention to the items in bold as they require corrective actions.			
Inspector		Reviewer	
<i>Michelle Waller</i>	<i>9/8/11</i>	<i>Martyn Burt</i>	<i>9/8/11</i>
Michelle Waller Division of Surface Water Southwest District Office	Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	Date

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) Do Categorical Standards apply?...If yes, list applicable standards.. N
- (d) Product(s) and production rates conform with permit application (Industries)..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

Compliance check run from 7/1/2009 – 7/1/2011. 6 Code violations were reported in May 2011. OEPA received correspondence regarding these violations.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
 - i. What does the back-up power source operate.....
 - ii. How often is the generator tested under load.....

- (b) Which components have an alarm system available for power or equipment failures.....

There is an autodialer which alarms when the air stripper goes down.

- (c) All treatment units in service other than backup units..... N/A
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

Calendar.

- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... N
- (g) Any plant bypasses since last inspection..... N/A
- (h) Any plant upsets since last inspection..... N/A

Comments/Status:

No Operation and Maintenance manual was able to be located, and onsite representatives were unaware of the location of one.

Section H: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained..... Y
Type of device (e.g. weir with ultrasonic level sensor):

Integral Mount Magnetic Flowmeter.

- (b) Calibration frequency adequate N
(Date of last calibration:)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) Actual flow discharged is measured..... N
- (f) Flow measuring equipment inspection frequency
Daily Weekly monthly other

Comments/Status:

(b) Chad McOmber was not aware of the flow meter having ever been calibrated. (e) The flow reported is the combined total from the flow meters on the two influent lines.
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Section I: Self-Monitoring Program (con't)

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
(see GLC page)
- (d) 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

Comments/Status:

a) Sample location unknown.

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N/E
- (b) Do SOP's include the following if applicable..... Y
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/E (see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All

Lab name: Belmont Labs

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Pipe into stream.

Receiving Stream: Little Miami River

Comments/Status:

Erosion has occurred at the bank around the outfall pipe. The pipe was visible due to low flow in the river, and was sticking out approximately 8 feet from the bank.

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:

Items Requiring Correction

1. O&M: No Operation and Maintenance plan was able to be located onsite. **A copy of this plan should be kept either at the treatment works or in a location nearby where it can be referred to if necessary.** Several questions were asked during the inspection which neither the on-site representatives or the consultant were able to answer regarding how the treatment process operated.
2. Flow Meter Calibration: There are no records showing that the flow meters have ever been calibrated. Chad McOmber supplied the OEPA with documentation stating that the manufacturer, Rosemount, only recommends calibration if you suspect the meter is not accurate. This is not acceptable for regulatory reporting purposes. According to the EPA NPDES Compliance Inspection Manual (7/2004), "*The facility must ensure that their flow measurement systems are calibrated by a qualified source at least once a year to ensure their purposes.*" **Unison must have a qualified source verify calibration within 90 days of the receipt of this report and submit results to the Ohio EPA.**
3. Representatives for the facility were unable to answer the question of where the effluent sample is taken. **Verify where the effluent sample is taken and send Ohio EPA the GPS coordinates so that the proper location is noted in the NPDES permit which is being renewed.** The coordinates may be e-mailed to Michelle Waller.