



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

September 15, 2010

Re: Pretreatment
Compliance Inspection
Cooper Standard Automotive, Inc.
Village of New Lexington

Mr. Dan Wing, Health, Safety & Env. Manager
Cooper Standard Automotive, Inc.
2378 S.R. 345 NE
New Lexington, Ohio 43764

Dear Mr. Wing:

On August 19, 2010, I inspected Cooper Standard Automotive's New Lexington facility. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented Cooper Standard Automotive during the inspection.

General Facility Description:

Cooper Standard Automotive manufactures tubing for use in automotive fluid handling applications. Process wastewaters are generated from contact cooling, strip cleaning, acid pickling, zinc phosphating, painting, quench and fume scrubbers. Average daily discharge flows during the previous year are estimated at 5,400 gallons. Wastewaters are subject to the Iron and Steel Manufacturing Point Source Categorical Standards, 420.96, and 420.126, and Metal Finishing Point Source Categorical Standards, 40 CFR 433.17.

Since the previous inspection, the facility completed the transfer of two coating lines (now referred to as Coating Lines 2 and 3), a mill line (Line 6) from its former Archbold plant and added twelve brazing lines.

Pretreatment System:

The pretreatment system consists of a batch potassium permanganate oxidation treatment system for oily wastewaters, equalization, neutralization, flocculation, and clarification. A filter press is used for sludge dewatering. Sludge is disposed at Athens Hocking Reclamation Center. Final effluent flow and pH are monitored continuously.

Contact cooling waters are discharged to the sample box without treatment. Noncontact cooling waters and sanitary flows are connected downstream of the sampling weir box. The compressor condensate, estimated at 30 gpd, is combined with the oily wastewaters for pretreatment.

Comments

1. Cooper Standard reported the following exceedances of IDP effluent limitations between January 2009 and July 2010:

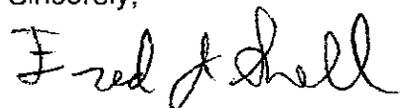
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01067	Nickel, Total	30D Conc	930	1130.	2/1/2010
001	01032	Chromium, Hexavalent	1D Conc	23	57.	1/26/2010
001	01032	Chromium, Hexavalent	1D Conc	23	53.	2/23/2010
001	01032	Chromium, Hexavalent	30D Conc	7.7	57.	1/1/2010
001	01032	Chromium, Hexavalent	30D Conc	7.7	53.	2/1/2010
001	01032	Chromium, Hexavalent	30D Conc	7.7	18.8	5/1/2010

You explained during the inspection that the nickel exceedance was corrected by altering the pH controls to enhance nickel precipitation. No further exceedances have been reported. The higher than expected hexavalent chromium results appear to have been related to laboratory interference, rather than the presence of hexavalent chromium in the discharge. Hexavalent chromium was eliminated from the process several years ago. Accurate analysis of all listed pollutant parameters is required by the IDP. Please request a detailed explanation from your contract laboratory for the invalid laboratory results, forward their response, and notify Ohio EPA of your plans to correct the situation.

2. Cooper Standard submitted a toxic organic management plan (TOMP) to Ohio EPA in January, 2010. Ohio EPA will provide comments on the TOMP in a separate communication to Cooper Standard in the near future.

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/mlm

Enclosure

c: Mark Cooper, Superintendent, Village of New Lexington WWTP
c: Pretreatment Unit, DSW, CO

PRETREATMENT Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD000013*EP	OHP000084	August 19, 2010	6	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
	1:00 pm	4/01/2009
Cooper Standard Automotive Inc. 2378 SR 345 NE New Lexington, Ohio 43764	Exit Time	Permit Expiration Date
	3:30 pm	3/31/2014

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dan Wing, Health, Safety and Environmental Manager	(740) 342-3523 ext. 437
Name, Address and Title of Responsible Official	Phone Number
Mark Lamanacusa, Plant Manager	(740) 342-3523

C. AREAS EVALUATED DURING INSPECTION

S = Satisfactory
 M = Marginal
 U = Unsatisfactory
 N = Not Evaluated

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>S</u> Pretreatment
<u>S</u> Records/Reports	<u>M</u> Laboratory	<u>NA</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</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>S</u> Collection System		

D. SUMMARY OF FINDINGS/COMMENTS(attach additional sheets if necessary)

See attached letter.


9/16/10
 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office Date


9/16/10
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office Date