



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

July 11, 2008

**Re: Pretreatment  
Liebert Corporation  
Compliance Inspection  
City of Ironton**

Mr. Darrin Callicoat, Facilities/Env. Manager  
Liebert Corporation  
3040 South Ninth Street  
Ironton, Ohio 45638

Dear Mr. Callicoat:

On May 29, 2008, I inspected Liebert Corporation's Ironton 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 Liebert Corporation during the inspection.

**General Facility Description:**

Liebert manufactures temperature control systems for electronics, computers, and communications equipment applications. Manufacturing operations include copper tube brazing, assembly of panels, compressors, cooling fans, cooling coils, leak testing, Freon charging, wiring, and final packaging. The water leak testing system has been replaced with a pressurized nitrogen gas system and the water leak test tank has been removed.

Some panels are powder coated prior to assembly. A 6 stage iron phosphating system is used to prepare the metal panels for coating. The stages include: 1) alkaline cleaning; 2) deionized water rinse; 3) reverse osmosis (RO) spray rinse; 4) phosphating; 5) deionized water rinse; and 6) RO spray rinse. RO rinse concentrates are returned to the cleaning stage and phosphating stage respectively. An Abanaki oil skimmer is used to remove oils from the cleaning stage. Deionized water is used as makeup water in all stages except the final rinses. When the cleaning and phosphating waste waters become contaminated with excess solids, they are disposed off site at United Waste Water Services in Cincinnati. Deionizer units are regenerated off site by US Filter.

Process waste waters are generated from the 6 stage iron phosphating system, brazing quench tanks located next to brazing work areas (roughly 10 tanks), and floor cleanup. The discharge of leak testing water to the sewer has been discontinued. All process wastewaters are now hauled to United Wastewater Services in Cincinnati for treatment.

**Comments:**

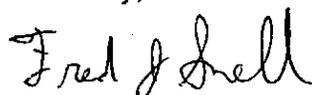
1. Liebert reported the following exceedances of IDP limits between July 2007 and June 2008.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01042	Copper, Total (Cu)	Max Conc	3380	4488	9/21/07
001	01042	Copper, Total (Cu)	30D Conc	2070	4488	9/1/07
001	01042	Copper, Total (Cu)	Max Conc	3380	15270	10/5/07
001	01042	Copper, Total (Cu)	30D Conc	2070	7654	10/1/07

2. Liebert's effluent monitoring report for the July through December 2007 reporting period included only one sample result and was not received until April, 2008. The IDP requires 3 samples each six months, and submittal of the report no later than one month following the reporting period. Liebert submitted a complete monitoring report for the July through December 2007 period on June 25, 2008. No further information is needed at this time.
3. Liebert has eliminated all sources of process wastewater to the sewer. I will recommend that Liebert's IDP be revoked. After the IDP is revoked, discharge of any process water to the sewer would be unlawful. Liebert would be required to apply for and obtain a new IDP prior to discharge of process waters to the sewer in the future.
4. Liebert should continue to submit effluent monitoring reports required in the IDP until the company receives notice from Ohio EPA that the IDP has been revoked.

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 Haskins, Superintendent, Ironton WWTP  
c: Julia Zhang, DSW, CO

# PRETREATMENT Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00038*AP	OHP000174	May 29, 2008	I	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Liebert Corporation 3040 South 9 <sup>th</sup> Street Ironton, Ohio 45638	1:00 pm	December 1, 2002
	Exit Time	Permit Expiration Date
	3:00 pm	November 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Darrin Callicoat , Facilities/Environmental Manager	(740) 547-5125
Name, Address and Title of Responsible Official	Phone Number
Emmett Kiritsky, Manufacturing Manager	(740) 547-5106

## 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>M</u> Records/Reports	<u>S</u> Laboratory	<u>NA</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>M</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.

Fred J. Snell  
 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

7/14/08  
 Date

Timothy M. Campbell  
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

7/14/08  
 Date