



**Environmental  
Protection Agency**

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

February 17, 2011

**Re:** Pretreatment  
Tusco Display  
Village of Gnadenhutten  
Permit No. ODP00036\*BP  
Compliance Inspection

Mr. Bob Markley, Production Support Specialist  
Tusco Display  
239 South Chestnut Street  
P.O. Box 175  
Gnadenhutten, Ohio 44629-0175

Dear Mr. Markley:

On January 12, 2011, I inspected Tusco Display. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and John Meek, Paint and Assembly Manager, represented Tusco Display during the inspection.

**General Facility Description**

Tusco Display manufactures racks and shelves for use in storage and display of commercial sales products. Shelves may consist of various materials, including wood, steel, wire, and plastic. Tusco also performs miscellaneous fabrication operations and painting of truck doors and door parts. Manufacturing operations include sheering, piercing, bending, welding, cleaning, cutting, coating and assembly. Laminated wood products may be cut and routed. A closed loop cooling system is used to cool the resistance welders.

Preparation operations for metal parts to be painted are performed in a 3 Stage washer. The 3 Stage washer consists of combined detergent clean and iron phosphate in the Stage 1 tank, continuous overflow rinse in Stage 2, and a final rinse in Stage 3. Next the parts are oven dried and electro powder coated prior to oven baking. No wastewater is generated from the powder coating booths.

Volumes of the components and approximate discharge frequencies are as follows: Stage 1 cleaning/conversion coating tank 3200 gallons (once per three months plus 1800 gallons to clean tank), Stage 2 rinse tank 1900 gallons (continuous overflow), Stage 3 rinse tank 1800 gallons (continuous overflow). Stages 2 and 3 tanks are dumped and cleaned about once per 3 months. The Stage 1 tank is emptied and cleaned when needed based on results of total dissolved solids monitoring. A 5000 gallon holding tank is used to store the Stage 1 wastewater for slow release to the sewer. Flow rate is controlled using a metering pump. The current release rate is 125

gallons per day which does not appear to cause foaming at the POTW. Rinse water overflows are estimated at 3.5 gpm in the winter, and about 5 gpm in the summer. The rinse water in Stage 2 is the cooling water from the air compressors, hence additional flow is used during warmer temperatures. Stage 3 uses city water.

Tusco has eliminated its paint stripping operation. The stripper solution was disposed off site and tank was decommissioned.

Tusco Display's wastewater is regulated by Metal Finishing Point Source categorical standards, 40 CFR 433.15. Tusco has an Ohio EPA Indirect Discharge Permit, effective October 1, 2007. Samples are collected using a composite sampler at the eight inch discharge line behind the plant. All process wastewaters are discharged through the sampling point. Samples are collected when the washer is in operation and the holding tank is discharging.

### Comments

1. Tusco reported results of only two samples during the January through June, 2010 reporting period. The IDP requires Tusco to report results of a minimum of 3 samples per 6 month reporting period. If there is no discharge of wash or rinse waters during a two month period, Tusco should indicate this on the discharge monitoring report using the AC reporting code in lieu of the sample result.
2. Tusco may wish to consider developing a toxic organic management (TOMP) plan in lieu of sampling for total toxic organics (TTO's) twice per year. If the TOMP is approved by Ohio EPA, sampling frequency for TTO's would be reduced to once every five years, which may result in a significant reduction in sampling costs. Information on TOMP development is available at [http://www.epa.ohio.gov/portals/35/policy/01\\_08u3.pdf](http://www.epa.ohio.gov/portals/35/policy/01_08u3.pdf). A copy of Ohio EPA's TOMP policy and development guidance document is attached.

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

Sincerely,



Fred J. Snell  
Pretreatment Coordinator  
Division of Surface Water

FJS/dh

Enclosure

- c: Pretreatment Unit, DSW, CO  
c: Michael Heil, Chief Operator, Village of Gnadenhutten WWTP

# PRETREATMENT Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP000036*BP	OHP000159	January 12, 2011	3	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Tusco Display 239 South Chestnut Street Gnadenhutten, Ohio 44629	1:30 pm	October 1, 2007
	Exit Time	Permit Expiration Date
	3:30 pm	September 30, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Robert Markley, Production Support Specialist	(740) 254-4343 ext. 234
Name, Address and Title of Responsible Official	Phone Number
Roger Matthews, Plant Manager	(740) 254-4343

## 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, Inspector, Ohio EPA, Southeast District Office 2/16/11  
Date

  
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office 2/17/11  
Date