



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

February 17, 2009

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

Mr. Don Hoffman, Compliance & Health Coord.
Tusco Display
239 South Chestnut Street
P.O. Box 175
Gnadenuhuten, Ohio 44629-0175

Dear Mr. Hoffman:

On January 16, 2009, 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 represented Tusco Display during the inspection. Tusco Display appeared to be in substantial compliance with its IDP at the time of 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 parts fabrication. 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 batch discharged

when needed based on results of total dissolved solids monitoring. A 5,000 gallon holding tank is used to store the Stage 1 wastewater for slow release to the sewer. Rinse water overflows are estimated at 3.5 gpm in the winter, and about 5 gpm in the summer. The rinse water is used to cool the air compressors, hence additional flow is needed during warmer temperatures.

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 at the eight inch discharge line behind the plant. All process wastewaters are discharged through the sampling point.

Required Actions:

1. The Gnadenhutten WWTP has experienced foaming in the pre-aeration and bioreactor tanks of its wastewater treatment plant in the past. The discharge of Tusco's Stage 1 tank and tank cleaning water was a contributing cause of the foaming. Tusco and Gnadenhutten developed an agreement including management procedures for the Stage 1 discharge to prevent the recurrence of operational problems at the WWTP. Tusco should continue to comply with all terms of the agreement and work with the Village on any adjustments to the terms to ensure there are no foaming problems in the future.
2. Tusco should report total combined rinse overflow and the holding tank discharge flow on sample dates. It appears that Tusco may have reported only the holding tank flows during the July through December 2008 reporting period.
3. Tusco's current sampling procedure does not meet the requirements of 40 CFR 403.15 and the IDP. Composite samples must be collected on a single date, rather than reported as a manual composite of grab samples collected on 4 separate dates. Tusco's sampling must be capable of demonstrating compliance with both daily maximum and monthly average effluent limits as defined in the CFR. Please submit the revised procedure to Ohio EPA for review prior to implementation.

Comments:

1. 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 reduction in sampling costs. Information on TOMP development is available at http://www.epa.state.oh.us/dsw/policy/01_08u3.pdf.
2. Ohio EPA inadvertently omitted zinc monitoring requirements from Tusco's IDP when the permit was renewed. Zinc monitoring is required by Metal Finishing

Point Source categorical standards, 40 CFR 433.15. Please continue monitoring for zinc 3 times per six months and retain the records of sampling results until the Ohio EPA is able to correct the zinc monitoring requirements in the IDP. I apologize for the inconvenience caused by this error.

3. Tusco reported results of only one sample during the January through June 2008 reporting periods. The IDP requires Tusco to collect a minimum of 3 samples per 6 month reporting period. Tusco has since developed written procedures for sampling requirements to reduce the likelihood that sampling requirements may be overlooked in the future.

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
ODP00036*BP	OH0020869	January 16, 2009	6	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Tusco Display 239 South Chestnut Street P.O. Box 175 Gnadenhutten, Ohio 44629	11:00 a.m.	October 1, 2007
	Exit Time	Permit Expiration Date
	1:00 p.m.	September 30, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Don E. Hoffman, Compliance and Health Coordinator	(740) 254-4343, Ext. 258
Name, Address and Title of Responsible Official	Phone Number

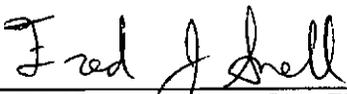
C. AREAS EVALUATED DURING INSPECTION

<input checked="" type="checkbox"/> S Permit	<input checked="" type="checkbox"/> S Flow Measurement	<input type="checkbox"/> NA Pretreatment
<input type="checkbox"/> M Records/Reports	<input checked="" type="checkbox"/> S Laboratory	<input type="checkbox"/> NA Compliance Schedules
<input checked="" type="checkbox"/> S Operations & Maintenance	<input checked="" type="checkbox"/> S Effluent/Receiving Waters	<input checked="" type="checkbox"/> M Self-Monitoring Program
<input checked="" type="checkbox"/> S Facility Site Review	<input checked="" type="checkbox"/> S Sludge Storage/Disposal	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> S Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

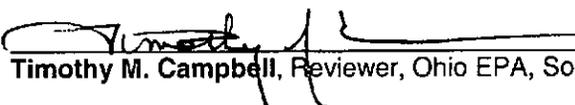
See attached letter.



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

2/17/09

 Date



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

2/17/09

 Date