



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 Korteski, Director

June 25, 2010

**Re:** Pretreatment  
WC Cardinal Company  
Permit No. ODP00028\*CP  
Village of Cadiz  
Industrial User Inspection

Mr. David Hilliard  
WC Cardinal Company  
#1 Industrial Park Road  
Cadiz, Ohio 43907

Dear Mr. Hilliard:

On June 10, 2010, I inspected W.C. Cardinal Company. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). David Hilliard represented W.C. Cardinal during the inspection.

W.C. Cardinal produces metal shelving and storage racks for industrial applications. The facility replaced the four stage washer with a three stage washer system since the previous inspection in 2002. Stage 1 includes detergent cleaning and iron phosphating, Stage 2 is currently used to capture drag out from Stage 1 for return to Stage 1. Stage 3 is used for rinsing. The drain for the rinse overflow was not serviceable at the time of the inspection.

W.C. Cardinal currently has all process wastewaters hauled off site by Safety Kleen. Wastewaters from the three stage washer would be regulated under 40 CFR 433.17 if discharged to the Village of Cadiz. The company holds an Ohio EPA Indirect Discharge Permit, but there have been no known discharges to the Cadiz sewer since the previous inspection.

**Required Actions:**

W.C. Cardinal's IDP requires the submittal of effluent monitoring reports twice each year. Ohio EPA has not received effluent monitoring reports from W.C. Cardinal since December 2007. W.C. Cardinal should submit effluent monitoring reports for 2008 through 2010, and begin submitting reports every six months while the IDP remains in effect. W.C. Cardinal is currently in violation of its IDP for failure to comply with the reporting requirements.

W.C. Cardinal's IDP expired in December 2008. The company has not submitted an application for renewal of the IDP. Please submit the renewal application if you wish to maintain the IDP. If the company has no plans to ever discharge process wastewater to the Cadiz sewer system, the company may request that Ohio EPA revoke the IDP.

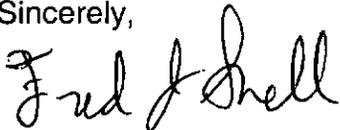
**Comments:**

Ohio EPA developed a web based electronic reporting system for preparing effluent monitoring known as e-DMR. W.C. Cardinal is strongly encouraged to use the e-DMR system for submission of future effluent monitoring reports. Information about e-DMR is available at <http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>.

You indicated W.C. Cardinal may wish to pursue discharge of rinse waters from the 3 stage washer in the future. There is a drainage trench located near the washer. If the company decides to pursue this option, dye testing should be performed to verify the drain is connected to the sanitary sewer. A suitable sampling location would also be needed to enable monitoring of the discharge. Please notify Ohio EPA and the Village of Cadiz of your plans prior to commencement of discharge to the drain.

Please respond to this letter in writing, within 45 days. If there are any questions, please contact me at (740) 380-5423.

Sincerely,



Fred J. Snell  
Pretreatment Coordinator  
Division of Surface Water

FJS/dh

Enclosure

c: Tom Carter, Superintendent, Village of Cadiz  
c: Pretreatment Unit, DSW, CO

# PRETREATMENT Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00028*CP	OHP000165	6/10/2010	3	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
W.C. Cardinal Company 1 Industrial Park Road Cadiz, Ohio 43907	12:30 pm	12/15/2003
	Exit Time	Permit Expiration Date
	1:30 pm	12/31/2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
David Hilliard	(740) 942-4411 X116
Name, Address and Title of Responsible Official	Phone Number
Harry Higgins, President	(740) 942-4411

## C. AREAS EVALUATED DURING INSPECTIONS = Satisfactory

M = Marginal  
U = Unsatisfactory  
N = Not Evaluated

<u>M</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>U</u> Records/Reports	<u>S</u> Laboratory	<u>NA</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>NA</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>NA</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 6/25/10  
 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office Date

Timothy M. Campbell 6/25/10  
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office Date