



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

October 30, 2007

**Re:** Belmont County  
Ohio Coatings Company  
NPDES Permit OIC00026\*DD  
OH0120588  
Correspondence (IWW)

Mr. Jim Tennant, Plant Manager  
Ohio Coatings Company  
2100 Tin Plate Place  
Yorkville, Ohio 43971

Dear Mr. Tennant:

On October 18, 2007, Tim Campbell, Eric Nygaard and I, of the Ohio EPA Division of Surface Water, conducted a Compliance Evaluation Inspection (CEI) at the Ohio Coatings Company (OCC) tin plating facility. Mike Roth, OCC Manager of Purchasing, Safety and Environmental, and David Donkin of Plymouth Technologies, represented OCC on the inspection.

The purpose of the inspection was to determine OCC's compliance status with the terms and conditions of the NPDES permit, federal number OH0120588, state number OIC00026\*CD. A copy of the inspection form is attached.

Based on the inspection and file review, the facility was found to be in **non-compliance** with the permit on the day of the inspection due to effluent violations. As a result of the inspection and file review, I have the following comments:

1. A review of the Monthly Operating Reports (MORs) from September 2004 to September 2007 indicates the following violations of the NPDES permit:

Outfall 601: 7/06 for Total Suspended Solids; and

Outfall 001: 9/04, 2/05, and 7/06 for Oil & Grease, and 9/04, 12/04, and 2/06 for Manganese.

Ohio EPA received reports addressing the reasons for these violations.

In addition, OCC violated the toxicity limits at outfall 001 in 12/04, 3/05, 6/05, 8/05, 12/05, 3/06, 6/06, 8/06, 12/06, 3/07, and 6/07.

2. As indicated above, the NPDES permit contains Industrial Whole Effluent Toxicity (WET) limits of 1.0 TUa. This has never been consistently achieved, as OCC has failed 16 out of 18 bioassays performed since 2/03.

OCC has investigated the plant and the process and has tried several changes to prevent failure of the bioassays, including use of onsite well water for dilution, and revising the water softening process through removing the softener units to minimize the use of salt which was thought to be contributing dissolved solids. Plymouth Technologies has assisted in evaluating the chemicals used in the processes but has not found anything that would cause the toxicity problem.

Ohio EPA has recommended that OCC hire a consultant with expertise in toxicity and metal finishing to perform a more extensive Toxicity Reduction Evaluation (TRE). OCC must provide a timeline for the evaluation and remediation.

Please respond, in writing, to item 2 above, within 14 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson  
Environmental Engineer  
Permits and Enforcement Section  
Division of Surface Water

AS/dh

Enclosure

- c: Mike Roth, Ohio Coatings Company (w/enclosure)
- c: Eric Nygaard, Ohio EPA, CO, DSW (w/o enclosure)
- c: AS file (w/enclosure)

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIC00026*DD	OH0120588	October 18, 2007	C	S	2

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ohio Coatings Company 2100 Tin Plate Place Yorkville, Ohio 43971	10:30 a.m.	July 1, 2006
	Exit Time	Permit Expiration Date
	12:45 p.m.	July 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mike Roth, Manager of Purchasing, Safety, and Environmental	(740) 859-5542
Name, Address and Title of Responsible Official	Phone Number
Jim Tennant, Plant Manager	

**C. AREAS EVALUATED DURING INSPECTION**

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

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

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

Effluent/Receiving Waters - see attached letter.

  
Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

10/30/07  
Date

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

10/30/07  
Date

**E. PERMIT VERIFICATION**

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments: Production is down this year.

**F. COMPLIANCE SCHEDULES/VIOLATIONS**

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule		X		
d. Compliance schedule contained in: _____			X	
e. Permittee is meeting compliance schedule			X	

Comments:

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator _____ Dual Feed <u>X</u>	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>1</u> Days/Week <u>5</u>	X			
e. Operator holds unexpired license of class required by permit Class: _____			X	
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained			X	
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: d. WW operators work 8 hrs/5 days a week. Plant has guards that monitor all other times.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 0%			X	
b. Any collection system overflows since last inspection (CSO ____ SSO ____ )			X	
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system			X	
g. Lift station alarm systems provided and maintained			X	
h. Are lift stations equipped with permanent standby power or equivalent			X	
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection			X	
j. Any complaints received since last inspection of basement flooding			X	
k. Are any portions of the sewer system at or near capacity			X	

Comments:

## II. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): \_\_\_\_\_ Submitted Date  
 \_\_\_\_\_ Approval Number  
 \_\_\_\_\_ Not submitted  
 \_\_\_\_\_ N/A

	Yes	No	N/A	N/
b. Sludge Management Plan current				
c. Sludge adequately disposed (Method: _____)				
d. If sludge is incinerated, where is ash disposed of? _____				
e. Is sludge disposal contracted (Name: _____)				
f. Has amount of sludge generated changed significantly since last inspection				
g. Adequate sludge storage provided at plant				
h. Land application sites monitored and inspected per SMP				
i. Records kept in accordance with state and federal law				
j. Any complaints received in last year regarding sludge				
k. Is sludge adequately processed (digestion, dewatering, pathogen control)				

- Comments:
- Iron sludge from WWTP and plating solution sludge are landfilled. American Waste hauls it to Apex Landfill.
  - Sodium Bichromate bags are handled as hazardous waste.

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement		Yes	No	N/	N/
a.	Primary flow measuring device properly operated & maintained. Type of device: <input type="checkbox"/> ultrasonic & parshall flume <input type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input type="checkbox"/> Other <input checked="" type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Specify: _____	X			
b.	Calibration frequency adequate (date of last calibration: <u>every 3 months</u> )	X			
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d.	Flow measurement equipment adequate to handle expected ranges of flows	X			
e.	Actual flow discharged is measured	X			
f.	Flow measuring equipment inspection frequency: _____ Daily <input checked="" type="checkbox"/> Weekly _____ Monthly _____ Other				

Comments:

Part 2 - Sampling		Yes	No	N/A	N/E
a.	Sampling location(s) are as specified by permit	X			
b.	Parameters and sampling frequency agree with permit	X			
c.	Permittee uses required sampling method	X			
d.	Sample collection procedures are adequate	X			
i.	Samples refrigerated during compositing	X			
ii.	Proper preservation techniques used	X			
	Conform with 40 CFR 136.3	X			
e.	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f.	Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3, Laboratory - General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b.	If alternate analytical procedures are used, proper approval has been obtained	X			
c.	Analyses being performed more frequently than required by permit	X			
d.	If (c) is yes, are results reported in permittee's self-monitoring report	X			
e.	Commercial laboratory used	X			
	1. Parameters analyzed by commercial lab: <u>All</u>				
	2. Lab name: <u>Test America</u>				

Comments: c. OCC has done bioassays in the past more frequently than required.

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/
f.	Quality assurance manual provided and maintained			X	
g.	Satisfactory calibration and maintenance of instruments and equipment			X	
h.	Adequate records maintained			X	
i. Results of latest U.S. EPA quality assurance performance sampling program:					
Date: _____ Satisfactory					
_____ Marginal					
_____ Unsatisfactory					

Comments:

**J. EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	
601	None	None	Slight	None	None	Light gray	

Comments:

**K. MULTIMEDIA OBSERVATIONS**

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments: