



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

April 21, 2009

**Re:** Morgan County  
MIBA Bearings US, LLC  
CEI - CSI 2009  
Permit #01C00000\*KD; NPDES #OH0048372  
Correspondence (IWW)

Ms. Heidi Suhoski, Env. Health & Safety Coord.  
MIBA Bearings US, LLC  
5037 North State Route 60  
McConnelsville, Ohio 43756

**Subject:** Comments from the Compliance Sampling Inspection (CSI) of MIBA Bearings.  
Please Respond by May 16, 2009.

Dear Ms. Suhoski:

On March 16, 2009, a CSI of the MIBA Bearings facility was conducted by the Ohio EPA, Southeast District, Division of Surface Water. The results of the sampling are still unknown. I was accompanied by Randy Spencer, Ohio EPA; Kelly Smith, Unit Manager, MIBA, McConnelsville; Ron Hardesty, Environmental Technician, MIBA, McConnelsville and you. The following are comments from the inspection:

- Permit violations
- Covering areas for storm water compliance
- Compliance Schedule

**Permit violations:**

We discussed the permit violations for pH, copper and lead. We reviewed the DMR's for February 2007 through February 2009. We also discussed that MIBA has consistently been on the U.S. EPA quarterly noncompliance list numerous times for metals violations. MIBA is taking action to resolve the violations. However, due to the chronic nature of the violations, we are recommending a formal enforcement referral. This is why I rated the Effluent and Receiving Waters portion of the inspection as ***marginal***.

**Covering areas for storm water compliance:**

The area for storage of recyclable materials from MIBA's factory is currently not covered by a roof. Also, MIBA has gravel areas that are used for storage areas for various materials. These are also uncovered and fall under the requirements of the storm water management plan. It was also noted that the roll off storage area had metal turnings

**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:

**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: <u>Part I, C. of current permit</u>	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>2</u> Days/Week <u>5/6</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: Facility is experiencing problems with metals removal. Item k., Outfall 002, CBOD5 8/08; SS 9/08.

## H. SLUDGE MANAGEMENT

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

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

Comments: Item f., decreased.

## I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/	N/
a. Primary flow measuring device properly operated & maintained. Type of device: <u>          </u> ultrasonic & parshall flume <u>          </u> calculated from influent <u>          </u> weir <u>          X          </u> Other <u>          </u> ultrasonic & weir <u>          </u> Specify: <u>Electrical and Flume</u>	X			
b. Calibration frequency adequate (date of last calibration: <u>No current calibration</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: <u>          X          </u> Daily <u>          </u> Weekly <u>          </u> Monthly <u>          </u> Other				

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: Coshocton Environmental, chemistry and biology samples; Alloway, toxicity Recording Equipment calibration out of date.

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 except PH, DO, CL2</u>				
	2. Lab name: <u>Coshocton Environmental, Allaway</u>				

Comments: Last years DMRQA was not completed.

#### J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	Clear	

Comments: 001- No visible contaminants

#### 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: Item a. , Waste turnings storage area. Metal turnings and oil on ground.