



State of Ohio Environmental Protection Agency

Southeast District Office

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

August 14, 2009

Re: Muskingum County
Burnham Foundry, LLC
2009 CEI
Correspondence (IWW)

Mr. Jeremiah Clegg, Plant Manager
Burnham Foundry, LLC
2345 Licking Road
P.O. Box 3148
Zanesville, Ohio 43702

Dear Mr. Clegg:

On May 20, 2009, I conducted a compliance evaluation inspection at your facility. The purpose of the inspection was to determine Burnham's compliance status with its NPDES permit. I was accompanied by Mr. Jim Dingey, Burnham, Environmental Engineer. The following are comments from the inspection:

- Violations
- Plant Stormwater Improvements

Violations:

We discussed the permit violations for the facility. The pH minimum and number of excursions violations from the past year did not appear to be actual violations. Your new NPDES permit has new reporting codes that will address this issue and should allow you to better account for pH. The new permit has been issued and has an effective date of July 1, 2009.

Plant Storm Water Improvements:

Burnham has made an effort to minimize storm water pollution with the addition of concrete in areas around the plant perimeter and with regular catch basin cleanings. Also, the scrap yard area has been cleaned up and refurbished and there have been plans to install concrete at the rear of the facility. The concrete is warranted since this has been a problem area in the past.

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 | | | |

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 | |

G. OPERATION AND MAINTENANCE

| Treatment Facility Properly Operated and Maintained | Yes | No | N/A | N/E |
|--|-----|----|-----|-----|
| a. Standby power available: Generator ____ Dual Feed ____ | | 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>3</u> Days/Week <u>5</u> | X | | | |
| e. Operator holds unexpired license of class required by permit Class: <u>1(3)</u> | 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 | | |

H. SLUDGE MANAGEMENT

| | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| b. Sludge Management Plan current | | | X | |
| c. Sludge adequately disposed (Method: <u>Suburban Landfill</u>) | X | | | |
| d. If sludge is incinerated, where is ash disposed of? _____ | | X | | |
| e. Is sludge disposal contracted (Name: _____) | | 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: 2 Plate frame presses, Industrial

I. SELF-MONITORING PROGRAM

| Part 1 - Flow Measurement | Yes | No | N/A | N/E |
|--|-----|----|-----|-----|
| a. Primary flow measuring device properly operated & maintained. Type of device: <u>003</u> ultrasonic & parshall flume _____ calculated from influent _____ weir <u>005</u> Other: Ultrasonic _____ ultrasonic & weir _____ Specify: | X | | | |
| b. Calibration frequency adequate (date of last calibration: <u>July 09</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 _____ Weekly _____ Monthly _____ Other | | | | |

Comments: Switching flow meter on 005 to Ultrasonic in July 09'.

| 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 | | | |

