



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

July 14, 2010

Re: Tuscarawas County
Zhongding USA, Inc.
Compliance Evaluation Inspection
Correspondence (IWW)

Ms. Toni Trowbridge, Human Resource Administrator
Buyer/Planner
Zhongding USA, Inc.
310 Railroad Avenue
Strasburg, Ohio 44680

Dear Ms. Trowbridge:

On June 17, 2010, I conducted a compliance evaluation inspection at Zhongding USA, Inc. The purpose of the inspection was to determine your compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number 01R00000*DD and to determine how to handle the permit renewal for the facility. You were present during the evaluation. The facility appeared to be in compliance with the permit at the time of the inspection. My inspection findings are summarized below.

At the time of the inspection, I was informed that the mixer broke down in late May 2010. At this time, the company has no plans to repair the mixer. All of the chemicals for the mixer have been shipped to your sister plant in Missouri resulting in no chemical addition on-site. The dust collector is no longer in operation, because the mixer is out of service. The coating building caught on fire during the winter resulting in the transfer of the coating process to the Strasburg facility. The nitrogen tumbling process, inspections and die trim have also been moved to Strasburg. All that is remaining at the Baltic facility are eighteen (18) presses which are operated by six (6) people on two different shifts. The presses are not being operated daily.

At the time of my inspection, the water was barely dripping from outfall 001. There was no discharge from the storm water outfalls. Based on the records we have, it appears there may still be presses that utilize non-contact cooling water. Please review each remaining press to determine if the unit uses non-contact cooling water. If you can provide additional information showing the presses do not utilize non-contact cooling water, we may be able to revoke the permit.

The NPDES permit for this facility expired on June 30, 2006. Ohio EPA received the renewal application on April 24, 2006. Ohio EPA prepared a renewal permit which was sent to our central office on January 22, 2010. After the draft permit was forwarded to

our central office, we learned Zhongding planned to permanently close the facility. Closure was to take place by the end of May 2010. It will be necessary for Zhongding to keep the agency posted on the closure of the facility. In the meantime, Zhongding should continue to sample in accordance with the expired permit until a renewal permit is issued or Ohio EPA is able to revoke the permit for the facility.

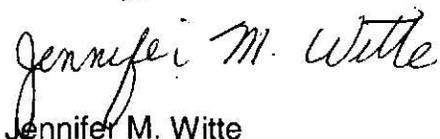
In the past, I have been informed that boiler blow down and sanitary wastewater is discharged to the Village of Baltic's sanitary sewer system for treatment. A review of your facility file indicates that boiler blow down at one point was directly discharged to Brush Run. It appears there were concerns with the temperature of the discharge. As a result, the company proposed to eliminate the direct discharge by installing a filtering and normalizing tank to filter out solids (e.g. rust from the water) and to cool the water to an ambient temperature over a twenty four (24) period. It appears the tank was to consist of a splash pad, twelve (12) inches of sand, three (3) inches of gravel 1/8" to 1/4" in size, three (3) inches of gravel 1/4" to 3/4" in size and three (3) inches of gravel 3/4" to 1 1/2" in size. The bottom of the tank allowed for a sediment settling area. The tank had a drain faucet which could be opened to then allow the water to discharge onto the ground. It will be necessary for Zhongding to determine if this tank is still used or provide documentation that the boiler blow down is connected to the village's sanitary sewer system. I have enclosed the information in the file for your review.

At the time of my inspection, the only material being stored outside were cured transfer pads waiting to be reground, covered dumpsters and wood pallets. I recommend evaluating the site to determine if you can certify "No Exposure." Information regarding "No Exposure" can be found at the USEPA web page http://cfpub.epa.gov/npdes/stormwater/exposure.cfm?program_id=6.

A copy of my completed inspection report is enclosed. Please submit a written response to the aforementioned comments within 30 days of receipt of this letter. The assistance and cooperation received during the inspection was appreciated.

If you have any questions, please contact me at (740) 380-5206

Sincerely,



Jennifer M. Witte
Chemical Engineer – Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01R00000*DD	OH0031381	June 17, 2010	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Zhongding USA, Inc. One Factory Street Baltic, Ohio 43804	10:00 a.m.	July 1, 2001
	Exit Time	Permit Expiration Date
	11:00 a.m.	June 30, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Toni Trowbridge, Human Resource Administrator	(330) 878-7800, Ext. 217
Name, Address and Title of Responsible Official	Phone Number
Toni Trowbridge, Human Resource Administrator Zhongding USA, Inc. One Factory Street Baltic, Ohio 43804	(330) 878-7800, Ext. 217

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>--</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>--</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>--</u> Sludge Storage/Disposal	<u>--</u> Other
<u>--</u> Collection System		

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

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

See attached letter.

Jennifer M. Witte
Jennifer M. Witte, Inspector, Ohio EPA, Southeast District Office

7/14/10
Date

Tim Campbell
Tim Campbell, Reviewer, Ohio EPA, Southeast District Office

7/15/10
Date