



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

November 16, 2007

**Re:** Tuscarawas County  
GE Lighting, Inc.  
Compliance Evaluation Inspection  
Correspondence (IWW)

Mr. Scott F. Carbaugh, Plant Manager  
GE Lighting, Inc. - Dover Products Plant  
200 West Broadway  
Dover, Ohio 44622

Dear Mr. Carbaugh:

On April 4 and October 24, 2007, I conducted compliance evaluation inspections at General Electric. The purpose of the inspections was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number OIS00010\*GD. The facility was found to be in compliance. Mr. Mike Cooper and you were present during the April 4 evaluation while Mr. Chad Canerdy and Mr. Cooper were present during the October 24 evaluation. My inspection findings are summarized below.

GE manufactures molybdenum wire for light bulbs. Non-contact cooling water from the furnace, swagging and rolling sections along with storm water runoff were discharged through NPDES permit outfall 001. There are two four stage cleaning lines in the fabrication building and one located in the main building. The wastewater from the washers is concentrated and pH adjusted prior to sending it to Clean Harbors for disposal. The rinse waters from the four stage cleaning lines is now treated in a closed loop wastewater system and no longer discharged via outfalls 601 and 001. The treatment system consists of oil removal, chlorination, carbon filters, cation/anion/cation filters and pH adjustment.

Waste hydrochloric acid, sodium hydroxide, paint and tungsten pieces with thorium sludge are stored in the "City Building" located along Tuscarawas Avenue. There are floor drains in this building and the floor slopes towards them. All liquid material in this building is stored in diked areas to prevent discharges into the floor drains. Our letter dated January 31, 2001 recommended GE determine where these floor drains go, and then eliminate them if possible. In addition, our letter requested GE to determine if there were any remaining floor drains located in the production plants and to eliminate them if possible. Your letter dated April 18, 2001 stated you were evaluating the floor drains in these two areas and would determine what course of action to take. Please inform this office of your progress in this area.

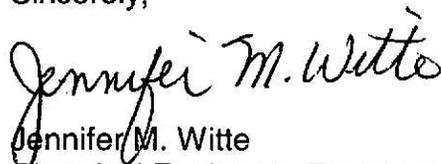
The non-contact cooling water at your facility is no longer discharged via outfall 001. However, storm water discharges continue to occur. There are four independent ITW Cooling Systems at your facility. One unit serves the hot ribbon mill, one unit serves the ribbon annealer and cold ribbon mill, one unit serves the tig welder and riveter and one unit serves the dry box welder. In addition, there is a larger unit which serves the platinum annealer, two stand rolling mill and tank 4. The source water supply line for each unit along with the non-contact cooling water discharge line from each unit has been disconnected. At the time of my inspection, we discussed the temporary type of caps installed on the discharger lines for the tig welder and riveter. I recommend GE explorer a more permanent solution in these two areas.

There are two moly-oxide dust collectors located outside the buildings. GE has significantly improved their housekeeping procedures in these areas to prevent storm water from becoming contaminated. The general storm water permit requires annual sampling at your facility. In addition, the permit requires GE to implement their Storm Water Pollution Prevention Plan (SWP3). In the future, GE may be able to certify "No Exposure" at their facility. Information regarding the "No Exposure" certification can be found at [http://www.epa.state.oh.us/dsw/storm/ind\\_noexp\\_cert.html](http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.html).

Your NPDES permit expired on June 30, 2006. Ohio EPA received your renewal application on January 4, 2006. Since the renewal application was submitted, GE has installed closed loop systems for the non-contact cooling water thus eliminating the discharge. In addition, GE has applied for and obtained a general storm water permit (Permit # 0GR00334\*DG). As a result, we are in the process of revoking your individual permit for the facility. GE must continue to submit monthly operating reports until the revocation becomes effective.

If you should you have any questions, please contact me at (740) 380-5206. In addition, if you should have questions regarding the storm water permit, please contact Aaron Wolfe at (740) 380-5277.

Sincerely,



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

JMW/dh

Enclosure

- c: Mike A. Cooper, EHS Lead
- c: Chad R. Canerdy, EHS Manager
- c: Tuscarawas County Health Department

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIS00010*GD	OH0041572	April 4, 2007	C	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
General Electric, Inc. 200 West Broadway Dover, Ohio 44662	10:00 a.m.	July 1, 2001
	Exit Time	Permit Expiration Date
	11:30 a.m.	June 30, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mike Cooper, EHS Lead	(330) 364-0231
Scott Carbaugh, Plant Manager	(330) 364-0200
Name, Address and Title of Responsible Official	Phone Number
Scott Carbaugh, Plant Manager	(330) 364-0200

## C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>N</u> Flow Measurement	<u>--</u> Pretreatment
<u>S</u> Records/Reports	<u>N</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>N</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

11/21/07  
Date

David D. Schmitt for  
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

11/21/07  
Date

**NPDES  
Compliance Inspection Report**

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IS00010*GD	OH0041572	October 24, 2007	C	S	2

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
General Electric, Inc. 200 West Broadway Dover, Ohio 44662	10:00 a.m.	July 1, 2001
	Exit Time	Permit Expiration Date
	11:30 a.m.	June 30, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mike Cooper, EHS Lead	(330) 364-0231
Chad Canerdy, EHS Manager	(330) 364-0235
Name, Address and Title of Responsible Official	Phone Number
Scott Carbaugh, Plant Manager	(330) 364-0200

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<u>  </u> S Permit	<u>  </u> N Flow Measurement	<u>  </u> -- Pretreatment
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<u>  </u> S Operations & Maintenance	<u>  </u> S Effluent/Receiving Waters	<u>  </u> S Self-Monitoring Program
<u>  </u> S Facility Site Review	<u>  </u> -- Sludge Storage/Disposal	<u>  </u> -- Other
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