Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 30, 2011

RE: Site Visit Observations and Notice of Violation

Mr. Tim W. McDaniel
Navistar, Inc.
6125 Urbana Road
Springfield, OH 45502

Dear Mr. McDaniel:

On November 2nd Katie Holcomb and I met with Lisa Silva and you to view Navistar's manufacturing and waste water treatment operations to give Ms. Holcomb a better appreciation for the nature of Navistar's operations as she prepares for the renewal of Navistar's NPDES permit. We viewed the paint preparation line, assembly areas, chemical storage room, paint building and waste water treatment facilities. It was noticeable to me that efforts have been made to remove dilapidated/unused equipment in and around the waste water treatment facility and to otherwise make things orderly. I believe this has a positive impact on overall operations and I commend you for your efforts.

During our walk-through of your facility, I noted the following items that need your attention:

1. The continuous bag for screenings was ripped in several places and in a way that indicated there may be a problem with the bag feed system. Please work to remedy this issue to help minimize odors and potential disease transmission.

2. There was an unusual amount of floatable plastics in the south clarifier that should not be able to get past the step screen in the influent channel. Please investigate the possibility that the water level in the influent channel is being maintained too high and allowing floatable material to get around the step screen through the bypass channel.

3. It was my understanding that the industrial clarifier was experiencing problems with the flights after being repaired earlier this year. Please provide an update of its status. I encourage you to continue your investigation into replacing it with a lamella plate clarifier as they have a long history of good performance. Please let me know of your plans as they develop.

Fecal Coliform Violation

On October 15th, Navistar violated its weekly fecal coliform limit with a result of 2,000 counts/100 ml. Given the long history of fecal coliform results well below the limit, please provide an explanation for the violation. I am particularly interested in the operational status of the UV disinfection system during the time of the violation.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

Toxicity Reduction Study

At our meeting on September 19th, Navistar said it would evaluate the waste water contributions from primary pretreat and prime line clean-out events to determine sources that might cause or contribute to the facility discharge being toxic to aquatic life. Along with identifying sources of toxicity, the investigation was to determine whether any waste waters generated during clean-out events needs to be managed in a particular manner or otherwise be hauled off-site for disposal. It was my understanding that Navistar planned to complete its investigation by the end of November.

As outlined in my August 25th letter to you, it is necessary for Navistar to explain why it believes the wastewater from clean-out events does not and will not cause or contribute to its discharge being acutely toxic or to otherwise propose changes in operations associated with clean-out events so as to ensure discharges will not be toxic in the future.

Please provide an update of your investigation and a date for when your findings and proposed actions will be submitted. Your response will be used to address the toxicity issue in the upcoming renewal of your NPDES permit.

Please provide a written response to the items presented in this letter by December 23rd. If you have any questions, please call me at (937) 285-6095.

Thank you again for taking the time to show Ms. Holcomb and me around your facility.

Sincerely,

Matt Walbridge
Division of Surface Water

ENCLOSURES

CC: Lisa Silva – Navistar (scanned copy via e-mail)

Ohio Environmental Protection Agency

Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0009954	*1IN00022*JD*	*11-2-11*	*Recon*	*S*	*2*

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Navistar, Inc. *6125 Urbana Road* *Springfield, OH 44501*	*1300*	*8-1-07* *(modified 3-1-11)*
	Exit Time	Permit Expiration Date
	1530	*1-31-12*

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Lisa Silva – Navistar / Environmental Engineering Supervisor *Tim McDaniel – Navistar / EH&S Manager*	*(937) 390-4026 (office) 605-0835 (cell)* *(937) 390-4024*
Name, Address and Title of Responsible Official	**Phone Number**
Tim McDaniel - Environmental Health and Safety Manager *Navistar, Inc.* *6125 Urbana Road* *Springfield, OH 44501*	*(937) 390-4024*

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Collection System

Section D: Summary of Findings (Attach additional sheets if necessary)

I was accompanied by Katie Holcomb of Central Office.

There was a noticeable amount of foaming in the equalization basin and in tank T2B.

There was foaming at the outfall but it did not persist into the stream.

There was a significant amount of plastics in the south clarifier skim beach.

The water level in the influent channel was high – it seems that floatable plastics may be able to get around the step screen via the bypass channel.

The continuous feed bag for receiving screenings was torn in several places below the chute and it appeared that there may be a problem with the bag feed system.

The flights on the industrial clarifier was said to be broken again and they are looking into a lamella plate clarifier to replace it.

Inspector	Reviewer
11-30-11	12/1/11
Matt Walbridge Division of Surface Water Southwest District Office Date	Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office Date