



**Environmental  
Protection Agency**

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

January 25, 2012

**Re:** Gallia County  
Electrocraft Ohio, Inc.  
City of Gallipolis  
ODP00022\*CP  
Pretreatment

Mr. Ed Swischer, Manufacturing Eng. Mgr.  
Electrocraft Ohio, Inc.  
250 McCormick Road  
Gallipolis, Ohio 45631

Dear Mr. Swischer:

On January 5, 2012, I inspected Electrocraft Ohio, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Mike Lawson, Environmental Technician, represented Electrocraft during the inspection.

**General Facility Description**

Electrocraft produces AC and DC electric motors and components. Manufacturing operations include stamping, welding, soldering, machining, milling, assembly, painting, baking, magnetizing, cleaning, tumbling and dye casting.

Some steel components are cleaned using a five stage washer prior to painting. The stages include detergent clean, rinse, phosphate conversion coat, rinse, and immersion in a solution containing boric acid and ethanolamine for corrosion inhibition. Casting cooling is performed using a closed loop cooling system.

Wastewaters are generated from the five stage washer, tumblers, floor cleanup and water based parts cleaning units. Only rinse overflows from the five state washer are discharged to the sewer. Other wastewaters are evaporated or recycled.

Electrocraft is regulated by Metal Finishing Point Source Categorical Pretreatment Standards (40 CFR 433.15) and holds an Ohio EPA Indirect Discharge Permit.

### **Pretreatment System**

Concentrated wastewaters are stored in an accumulation tank, then treated in an oil skimmer tank to remove oils for recycling prior to evaporation. Sludge and oil is hauled off site by Safety Kleen.

### **Required Actions**

1. Electrocraft is required in Part III, Paragraph 3 of its Ohio EPA Indirect Discharge Permit to submit effluent monitoring reports to Ohio EPA using the e DMR internet application not later than the 20th of January and 20th of July each year. Ohio EPA has not received a report for the January through June, 2011 reporting period. Electrocraft did collect and analyze samples during the referenced period. Please submit a report for the January through June, 2011 reporting period no later than February 15, 2012.
2. Electrocraft is required in Part III, Paragraph 4 of its IDP to calibrate and maintain all monitoring and analytical instrumentation to ensure the accuracy of measurements. Electrocraft should obtain appropriate buffer solutions for calibrating the pH meter, perform calibration of the meter before sampling, and maintain calibration records.
3. Electrocraft is required to provide reliable flow measurements in Part 1.A of its IDP. The basis for the process flow values reported was unclear. Please identify and implement a method of obtaining either flow measurements or reliable estimates of flow on sample dates.

### **Comments**

1. Electrocraft's IDP was renewed in August 2010. The monitoring frequency for all parameters except Total Toxic Organics (TTO) was reduced from once per two months to quarterly. Electrocraft may elect to monitor more often than the minimum required monitoring frequency.
2. Electrocraft provided a revised Toxic Organic Management Plan to Ohio EPA in March 2010. Electrocraft may submit certification statements with effluent monitoring reports, in lieu of TTO sampling, in accordance with Part II, Paragraph 2, of the IDP, until the IDP is renewed in 2015. Please review the eligibility requirements for TTO certification in Part II, Paragraph 2.C. of the IDP.
3. Electrocraft obtained a no exposure certification under the Industrial Stormwater General Permit 0GRN00102\*DG. By signing and submitting the No Exposure Certification form, Electrocraft certified that a condition of no exposure exists at its facility or site, and Electrocraft is obligated to comply with the terms and conditions of Ohio Administrative Code (OAC) 3745-39-04(G).

Please respond to this letter in writing, within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Fred J. Snell".

Fred J. Snell  
Pretreatment Coordinator  
Division of Surface Water

FJS/dh

Enclosure

c: John Westfall, Gallipolis WWTP  
c: Pretreatment Unit, DSW, CO

# Pretreatment Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00022*CP	OHP000133	January 5, 2012	3	S	2

## B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Electrocraft Ohio, Inc. 250 McCormick Road Gallipolis, Ohio 45631	11:00 a.m.	August 1, 2010
	Exit Time	Permit Expiration Date
	1:30 p.m.	July 31, 2015

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Mike Lawson, Environmental Technician	(740) 441-6267
Ed Swischer, Manufacturing Engineering Manager	(740) 441-6229
Name, Address, & Title of Responsible Official	Phone Number
Rick Roberts, Plant Manager	(740) 441-6200

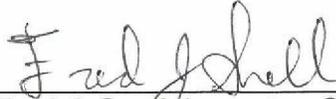
## C. AREAS EVALUATED DURING INSPECTION

<u>  </u> S Permit	<u>  </u> M Flow Measurement	<u>  </u> S Pretreatment
<u>  </u> M Records/Reports	<u>  </u> S Laboratory	<u>  </u> N/A Compliance Schedules
<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> S Sludge Storage/Disposal	<u>  </u> Other
<u>  </u> S Collection System		

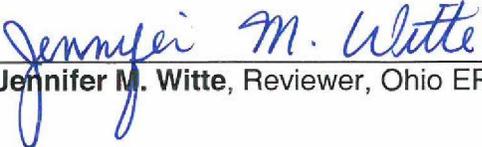
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

See attached letter. IU nonsampling inspection.

  
 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

1/24/12  
 Date

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

1/25/12  
 Date