



**Environmental
Protection Agency**

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

January 25, 2012

Steve Overby, Operations Manager
Evans Adhesive Corp Ltd
925 Old Henderson Road
Columbus, OH 43220

**Re: Evans Adhesive Corp Ltd
NPDES Permit 4IN00099/ OH0096954
Reconnaissance Inspection
Franklin County**

Dear Mr. Overby:

On January 10, 2012, a Reconnaissance Inspection was conducted at the Evans Adhesive Corp Ltd. Present for the inspection were yourself, representing Evans Adhesives, and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

The Reconnaissance Inspection raised several concerns which must be addressed in the following areas:

Oil and Grease Sample Collection: Grab samples for oil and grease are being collected using a stainless steel beaker attached to a pole to facilitate sample collection at the outfall. Please be advised that grab samples for oil and grease must be collected directly into the glass sample container provided by your contract laboratory.

Outfall Signage: In accordance with Part II. F (page 4) of the effective NPDES permit a sign identifying the location of the outfall 001 discharge to the unnamed tributary to the Olentangy River was required to be installed no later than February 1, 2011. The sign was subsequently installed the week after the compliance inspection was conducted.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael Sapp
Field Operations Unit
Division of Surface Water
Central District Office

ec: Mike Sapp

MS/nsm Evans Adhesives

Central District Office
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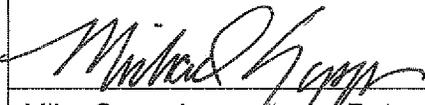
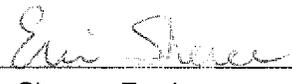
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00099	OH0096954	RI	S	Industrial
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
1/10/2011	9:30 AM	10:30 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Evans Adhesive Corp, Ltd 925 Old Henderson Road Columbus, Ohio 43220	10/1/2010
	Permit Expiration Date
	9/30/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Steve Overby, Operations Manager	(614) 451-2665
Name and Title of Responsible Official	Phone Number
Steve Overby, Operations Manager	(614) 451-2665

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Failure to meet schedule for signage installation
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	Please revise oil & grease sample collection technique

Comments:

Signatures	
 1/20/12	 1/20/12
Mike Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

ADDITIONAL INFORMATION
Evans Adhesive Corporation
4IN00099*DD - OH096954

General

Evans Adhesives produces a variety of pressure-sensitive hot melts, polyamides, APAO, EVA packaging hot melts, and various water-based adhesives for use in an assortment of packaging applications. Raw products used at this facility primarily include starches and dextrin. The materials are used to create a water-based emulsion and are heated to 200 degrees Fahrenheit to impart adhesive characteristics. Cooling water is used to reduce the temperature of the reaction vessels after the reaction has occurred. Cooling water is produced from 7 reaction vessels which vary in size from 250-2500 gallons. The plant can operate all 7 vessels at a time during the normal shift (6:00 AM- 5:00 PM) five days a week. Cooling water is supplied by City of Columbus water. The reported daily volume of cooling water discharged varies between 10,000 – 20,000 gpd. Reported pH values range from 6.82 S.U. to 7.81 S.U. The maximum oil and grease concentration reported since the previous inspection in April 2008 was 4.0 mg/l. Maximum monthly water temperatures are in the range of 49 – 62°C.

At the time of the inspection, the following general observations were made with operational practices at the facility:

1. A magmeter and flow totalizer are used to record the daily flow of cooling water discharged.
2. pH analysis is done at the facility in the quality control lab. Calibration of the pH meter, with three standards, was satisfactory (weekly calibration). American Analytical performs contract laboratory services for oil & grease analysis.
3. The magmeter is periodically checked against the water balance between the influent water and deduct meters.
4. A maximum indicating thermometer is used to record maximum temperatures. The thermometer is kept permanently in the outfall sampling sump for the monthly reporting period. The maximum temperature for that month is reported on the monthly operating report forms.
5. Grab samples for oil and grease are being collected using a stainless steel beaker attached to a pole to facilitate sample collection at the outfall. Please be advised that grab samples for oil and grease must be collected directly into the glass sample container provided by your contract laboratory.
6. In accordance with Part II. F (page 4) of the effective NPDES permit a sign identifying the location of the outfall 001 discharge to an unnamed tributary to the Olentangy River was required to be installed no later than February 1, 2011. No outfall signage was observed at the time of the inspection; however, a

photograph of the sign was provided on January 18, 2012 shortly following installation.

7. No NPDES permit violations have been reported since the last inspection was conducted in April 2008.

Compliance Data for Evans Adhesive Corp Ltd between 4/1/2008 to 11/30/2011

Summary

Permit Effluent Limit Violations: 0

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0