



Environmental
Protection Agency

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

February 10, 2012

Mr. Brian Kadel
Hobart Corporation
1495 North High Street
Hillsboro, Ohio 45133

Re: Hobart Corporation -- Hillsboro -- Inspection & Notice of Violation

Dear Mr. Kadel:

On January 25, 2012, I conducted the annual industrial user (IU) inspection at the Hillsboro facility. The facility was represented by Terry Britton. Hobart Corporation is regulated under the Metal Finishing Existing Source Standard, 40 CFR 433.15. The inspection covered the assembly areas, the parts washer and powder coat line, outside storage areas, and the scale area.

The facility has realigned its production. The Hillsboro facility has the various lines associated with meat production, mixing and wrapping. In addition, the assembly of the middle tier mixers was brought back to the facility. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Hobart Corporation manufactures food processing equipment for grocery stores, food packaging, and restaurant sectors. The products produced at this facility include scales, food wrappers, meat saws, meat grinders, meat blenders, and mixers. The facility also assembles products for Mannhart and Berkel lines.

Regulated Process Flows

The process flow is generated from an iron phosphating line. The second and fourth stages continuously overflow into a trench that flows to the sewer. When the process baths are changed out, they are also discharged to the sewer. GE Betz is the chemical supplier for the line. They assist the facility in operating the baths efficiently. The powder coat line that follows the phosphating line is operating as designed. In the past, there was flow from tumblers located throughout the facility. Since the machining operations were replaced with assembly operations, the tumblers have not been needed. There is one small tumbler left, and it was moved into the maintenance shop. The flow would be present at the manhole located outside of the shop.

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Sampling

Hobart has been sampling as required. The facility is required to report dilution flow on its self-monitoring reports. There were no dilution flows reported for the first half of 2011, but they were reported for the second half of 2011. This will serve as the Notice of Violation for these reporting violations. Currently, there is not a reliable way to measure the dilution flow. After discussion during this inspection and last year's inspection, the facility should consider moving the sampling location to an "end-of-process" location. Since the iron phosphating line is the source of process flow, it may be possible to move the sampling station to a manhole adjacent to the maintenance shop. All of the process flow would be captured, but there would not be any dilution flow present. This would also eliminate the need to use the combined wastestream formula (CWF) for the permit discharge limits. The facility would need to submit a permit modification application to do this.

Waste Collection and Disposal

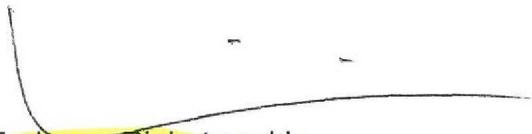
Safety Kleen manages the solvent in the two parts washers remaining at the facility. They come out every 16 weeks. In the past, United Waste Water Services has taken the coolant from the facility. Any scrap metal is taken to Wilmington Iron and Metal. Rumpke takes the solid waste from the facility.

Stormwater Permitting

Hobart had coverage for its stormwater under the previous industrial general stormwater permit. The facility is planning on obtaining coverage under the new general permit.

If you would have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosure

cc: Terry Britton, Hobart
Brandon Leeth, Hillsboro
Ryan Laake, DSW/CO

MP/ca



State of Ohio Environmental Protection Agency
Southwest District Office

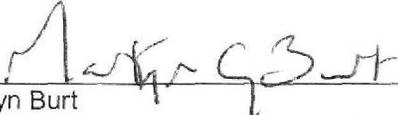
Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00019*FP	OHP000086	01/25/2012	IU	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Hobart Corporation 1495 North High Street Hillsboro, Ohio 45133		12:10 pm	05/01/2010
		Exit Time	Permit Expiration Date
		2:15 pm	04/30/2015
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Terry Britton, Maintenance Manager		937.840.5109	
POTW Receiving Discharge		Categorical Standard(s) or Other Classification	
City of Hillsboro		40 CFR 433.15	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	

Inspector	Reviewer
	
2/10/12	2/10/12
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Hobart Corporation**

Date of inspection: **January 25, 2012**

OH Number: **OHP000086**

IDP Number: **1DP00019*FP**

Facility Representative: **Terry Britton**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **January 27, 2011**

2. Has the facility been in compliance with its permit limits since the last inspection? Y/N
If no, explain:

There were no limits violations during the past year. There were no dilution flows reported for the first half of 2011. This was corrected, and the dilution flows were reported for the second half of 2011.

3. Is the facility in compliance with all other requirements?

Sampling procedures	Y/N/NA
Reporting (late reporting, failure to report, etc)	Y/N/NA
Compliance schedules	Y/N/NA
Submitted BMR and 90 day compliance reports	Y/N/NA
Any other requirements	Y/N/NA

If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? Y/N
Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **113**

6. Shifts/Day: **1**

7. Production Days/Year: **243**

8. Hours/shift: **8**

9. Any production changes since the last inspection? Y/N
If yes, explain:

The facility did outsource its machining. The Hillsboro facility is doing assembly only. There is only one tumbler left at the facility. This was moved into the maintenance shop. The phosphate washer and paint line remain on-site.

10. General facility description and operations:

Manufacture food wrapping machines, meat saws, meat grinders, mixers, meat blenders, and scales. The facility also owns a company named Berkel. The mid-tier mixer is a Berkel product. It should be moved out by mid-2012. They manufacture bread slicers, slicers, and meat tenderizers. Hobart also owns Mannhart Co. They manufacture food processors. These have been moved out to Richmond Hill. The company is realigning production so like products will be made at the same manufacturing locations. Some mid-tier products may be brought back from China. Right now, the voltages on the machines from China are being changed at the Hillsboro facility.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:
12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

There was additional assembly brought on-site, however, the machining operations were removed from the facility's. The water jets, washers and burnishers associated with the machining left. There may be a small increase when the new lines are brought in, but it would only be four or five people. The wastewater will not be impacted.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

There is no pretreatment equipment at this facility.

14. Was a PTI issued for the treatment system? NA
15. Were there any modifications to the treatment system since the previous inspection? NA
If yes, was a PTI obtained? NA
PTI Number: **NA** Date: **NA**
16. What is the treatment mode of operation? Batch / Continuous / Combination
If batch, list the frequency and duration:
17. Who is responsible for operating the treatment system? NA
18. How often is the treatment system checked? NA

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? NA
Explain:
20. Is there an operations and maintenance manual? NA
21. Is an inventory of critical spare parts maintained? NA
If yes, list:
22. Are there any bypasses in the system? NA
If yes, describe the location:
- Have bypasses occurred since the last inspection? NA
- Was the POTW notified? NA
23. Are residuals or sludges generated? Y/N
Method of disposal:

Safety Kleen takes the residuals from the parts washer. This is classified as non-hazardous. Wilmington Iron and Metal is taking the scrap metals. There is only two parts washers left.

Frequency and amount of disposal:

Safety Kleen comes out every sixteen weeks to maintain two parts washers, The only two parts washers remaining are in maintenance.

Name of hauler/landfill/disposal facility:

Is any sludge generated subject to RCRA regulations? Y/N

If land applying sludge, is there a sludge management plan? Y/N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1) Parts washer, phosphating	<i>End-of-Pipe</i>	5,400	6,000		
Total Regulated Process Flow					
Non-Contact Cooling			-		
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			-		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary	3,000		2,260		
TOTAL FLOW	8,400		8,260		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

The facility has coverage under the general industrial storm water permit. They will be reapplying for coverage under the new general industrial stormwater permit.

SELF MONITORING

26. Sample location(s) described in the facility's permit:

The manhole prior to the discharge entering the sewer.

27. Is the facility sampling at the location(s) described in the permit? Y / N
If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? Y / N
If no, indicate a representative location:

The facility should consider modifying its permit to allow for an end-of-process sampling location. That would eliminate the use of the Combined Wastestream Formula and more representative sampling. This would also eliminate the need to report a dilution flow.

29. Is the flow measured or estimated? Measured / Estimated

If measured, how often is the meter calibrated?

Use water meter readings.

If estimated, describe method of estimation:

Did an estimation based on the timing of flow into a bucket.

30. Is pH monitored continuously? Y / N
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? Y / N
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y / N
Monitoring frequencies Y / N
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N
Flow proportioned samples ***Time composited.*** Y / N
Proper preservation techniques Y / N
Sample holding times Y / N
Chain-of-custody forms Y / N

33. Are samples analyzed in accordance with 40 CFR 136? Y / N

34. Laboratory conducting analyses:

Belmont Labs

TOXICS MANAGEMENT

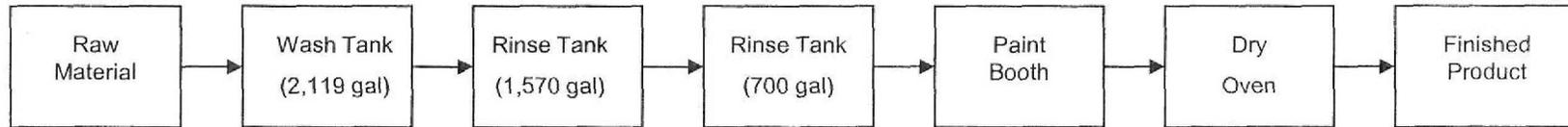
35. Are any listed toxic organics used in the facility? Y/N
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? Y/N
If yes, is it being implemented? Y/N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y/N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y/N
If yes, does the facility have a written plan? Y/N
39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS

Hobart Corporation – Hillsboro Plant

Process Schematic

Paint Line



March 4, 2009