



Environmental
Protection Agency

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

February 14, 2012

RE: Compliance Evaluation Inspection and
Notice of Violation

Mr. Ralph Stacy
The O.S. Kelly Company
P.O. Box 1267
Springfield, OH 45501

Dear Mr. Stacy:

On January 19th I met with Mr. Mike Heironimus to conduct an inspection of your facility's operations as they relate to non-contact cooling water and storm water discharges to Buck Creek. A review of your self-monitoring reports since the previous inspection revealed a violation of your monthly average total suspended solids limit of 30 mg/l in February 2009 for outfall 002 when you reported 43 mg/l and a violation of the lower pH limit of 6.5 SU on May 3, 2011 for outfall 001 when you reported a value of 6.13 S.U.. Suspended solids are associated with the management of foundry sand on the site, but the pH of the ground water used for cooling water would not be expected to be low or to fluctuate. I will address pH monitoring later in this letter.

In December 2010, The O.S. Kelly Company also failed to conduct monthly Oil and Grease and pH monitoring for outfall 001 and monthly Flow, Oil and Grease and Total Suspended Solids monitoring at outfall 002. Although these monitoring violations are isolated and occurred over a year ago, I ask that you please provide an explanation for the missed monitoring and a plan for ensuring missed monitoring doesn't occur in the future.

I noted that you are often using alternate reporting codes 'AC' and 'AN for flow monitoring at outfall 001. Please note that with a required monitoring frequency of once per month it would be acceptable if you did not enter these reporting codes if you otherwise provide flow monitoring data at the required frequency.

You are providing daily flow monitoring data for outfall 002 and the data indicates flows are not highly variable. It would be acceptable to provide a monthly average daily flow on the day monitoring occurred by dividing the total discharge flow during the month by the number of days the discharge was active during the month. If you do this, please include a note with the entered value indicating how the number was derived.

Finally, temperature values for October 2011 were entered with an apparent decimal point error (e.g. 0.18 instead of 18). It is necessary to resubmit the monitoring report for that month to correct the entries. Please inform me when the corrected report is submitted.

pH Monitoring

1. Mr. Heironimus was not able to demonstrate how to calibrate the pH meter and he indicated that the meter is otherwise not calibrated immediately prior to the analysis of samples collected for NPDES reporting purposes. To address this need, it is necessary to develop a written procedure for calibrating the meter and analyzing samples.

It is also necessary for you to develop a log book for recording activity associated with the use of the pH meter. In addition to providing a record of the date and time the meter is calibrated, along with any maintenance activity, the log book will provide documentation for when samples are analyzed. The front of the log book is an ideal location to keep the operating procedure discussed above.

Please provide a log book and written procedure by March 9th.

2. The only record of pH analysis results is on a message board in Mr. Heironimus's office until they are entered in the Discharge Monitoring Report (DMR). Along with entering analytical results in the pH meter log book, as discussed above, I recommend results also be recorded on the chain of custody sheet being generated for the sample sent to Belmont Laboratories. This practice will best document that the result is associated with the sample collection date and time recorded on the form. The result should be initialed by the person that performed the analysis (which might not be the person that collected the sample). Please indicate your intentions to implement this change.
3. Although there were no records that allow me to demonstrate that samples are not being analyzed for pH within 15 minutes as required, it was my impression that samples are likely not being analyzed within this period. As documented using the record-keeping practices discussed above, please ensure all future samples are analyzed within 15 minutes of collection.
4. Reported pH readings for outfall 001 exhibit more variability than I would expect for non-contact cooling water using well water. Addressing the calibration issue above may resolve this variability but if not, it will be necessary for you to investigate the cause for the variability.

Storm Water Pollution Prevention Plan

Mr. Heironimus documents his weekly inspections of outside storage areas where sand (virgin and spent) and broken molds are exposed to storm water which can carry those materials into Buck Creek. In all the records I saw, his notes identified accumulations of materials that should be cleaned up. The attached picture of accumulated sand illustrates the need for better housekeeping practices.

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A review of your Storm Water Pollution Prevention Plan (SWP3) dated January 19, 2009 revealed that, although it calls for weekly inspections, it does not identify what actions will be taken in response to findings from those inspections.

To address this deficiency in the plan, it is necessary for you to revise the SWP3 to identify the person(s) responsible for initiating necessary clean-up activities and those that will be responsible for conducting the clean-up activities. Timeframes for these actions should be short and the means for clean-up (equipment and procedures) should be outlined by the plan. It would be appropriate for the plan to call for a root-cause analysis if chronic problems are revealed by the inspections (e.g. why does sand always accumulate at the new sand silos and how can it be remedied?).

Please provide a revised SWP3 by April 6th (a scanned copy via e-mail is acceptable).

If you have any questions about this letter or attached inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

ATTACHMENT

CC: Mike Heironimus (scanned copy via e-mail)

MW/uf



NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
1IS00023*BD	OH0085898	1-19-12	Recon	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
O.S. Kelly Company 318 E. North Street Springfield, OH 45503	9000	9-1-09
	Exit Time	Permit Expiration Date
	1010	8-31-14
Name(s) and Titles of On-Site Representative(s)	Phone Number(s)	
Mike Heironimus – Environmental Consultant	(937) 322-4921 ext. 141	
Name, Title and Address of Responsible Official:	Phone Number / e-mail address	
Ralph Stacy – Plant Manager O.S. Kelly Company 318 E. North Street Springfield, OH 45503	(937) 322-4921 rstacy@oskelly.com	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE – Not Evaluated)

S Permit	NE Flow Measurement	NA Pretreatment
S Records/Reports	NA Laboratory	NA Compliance Schedules
M Operations & Maintenance	NE Effluent/Receiving Waters	NA Collection System
M Facility Site Review	NA Sludge Storage/Disposal	NA Other
U Self-monitoring Program		

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

- *pH is not always being analyzed within 15 minutes.*
- *pH meter is not being calibrated prior to analysis.*
- *No log book for calibrations of pH meter or SOP for operation/calibration of the meter. Unable to show how the meter is calibrated.*
- *It does not appear that the pH meter functions properly.*
- *pH readings are being noted on a white board until they are entered into e-DMR. They should at least be recorded on the chain of custody sheet for the sample sent to Belmont for analysis - including date, time and analyst's name.*
- *Spent foundry sand is placed in dumpsters that are hauled to a landfill every day. Areas around the dumpsters have sand from overflowing of the dumpsters and there are piles of broken sand molds that couldn't be fit into a full dumpster or when a dumpster wasn't available.*
- *Sand silos for virgin sand had a lot of accumulation on the ground around them. See picture.*
- *Documentation of weekly storm water inspections almost always identify accumulations of foundry sand on the ground. Need to get these observations to trigger clean-up actions. SWP3 doesn't specify what actions will be taken to remedy the findings.*

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 2-14-12
Name and Signature of Reviewer(s) Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 2/14/12

