



**Environmental
Protection Agency**

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

May 7, 2012

RE: HOLMES COUNTY
SPERRY AND RICE
NPDES PERMIT No. 3IR00050
IDP No. 3DP00027

Mr. Tim Morris, Plant Manager
Sperry & Rice Manufacturing Company, LLC.
1088 North Main Street
Killbuck, Ohio 44637

Mr. Morris:

On April 20, 2012, this writer conducted an inspection of the Sperry & Rice facility in Killbuck, OH. The facility is regulated by two permits for the discharge of wastewater. The discharge of noncontact cooling water to Killbuck creek is regulated by National Pollutant Discharge Elimination System (NPDES) Permit No. 3IR00050, and the discharge of contact cooling water to the Killbuck WWTP is regulated by indirect discharge permit (IDP) 3DP00027. The intent of the inspection was to verify information submitted with the NPDES Permit renewal application and to determine if any changes to the facility had been made that could impact compliance with either permit. A pretreatment inspection was also conducted to review monitoring procedures for wastewater discharged to the Killbuck publicly owned treatment works (POTW). Bonnie Smail and Ed Shultz accompanied this writer during the plant inspection.

Observations

The following are observations and discussions during the inspection:

NPDES Permit No. 3IR00050

1. According to the NPDES Permit, Sperry and Rice is to submit self-monitoring reports to Ohio EPA on a monthly basis. However, prior to the inspection, the most recent self-monitoring report submitted to Ohio EPA was July 2011. This same issue was discussed during the previous inspection on August 4, 2011 and documented in a September 1, 2011 letter.

As we discussed, failure to submit monthly reports is a violation of the NPDES Permit and is subject to enforcement action. Sperry Rice must modify reporting procedures to ensure that the compliance reports are submitted in accordance with the NPDES Permit.

2. During the inspection, we discussed the Storm Water Pollution Prevention Plan (SWP3) used by Sperry and Rice to comply with the Parts IV, V and VI of the NPDES permit. The following are topics of discussion regarding the Storm Water Pollution Prevention Plan (SWP3):
 - a. Periodic inspections are identified in Appendix F of the SWP3. It was explained that Ed Shoults conducts the inspections; however, no record of the inspections have been made to date. As stated in the September 1, 2011 inspection report

from this office, inspections conducted in accordance with the SWP3 must be documented.

Sperry and Rice must develop record keeping procedures, and a record of each storm water inspection must be maintained. The inspection records must be presented when requested in accordance with Part IV.B.2 of the NPDES Permit. The inspection record must include, but not be limited to, the person conducting the inspection, the date of the inspection, the area of plant inspected, any problems encountered during the inspection, and actions taken to correct any problems.

- b. Page 6 of the SWP3 includes a requirement for employee training. The training must be at the frequency identified in the SWP3 and must be recorded. The training record must include the topics covered during the training, a sign-in sheet of those in attendance, the date of the training, and the person conducting the inspection.
- c. Page 7 of the SWP3 includes an annual Comprehensive Inspection. During this inspection, it was indicated that the plant manager is responsible for conducting the inspection. As we discussed, it may not be necessary to maintain this requirement in the SWP3. However, until such time as the SWP3 is modified to remove this requirement, the inspections must be conducted and recorded.
- d. In accordance with Part IV.B.1 of the NPDES Permit, the final SWP3 must be properly signed in accordance with 40 Code of Federal Regulations (CFR) 122.22. The proper signatories are as follows:

"(i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or

(ii) The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures."

A final, signed SWP3 must be available for review during the next inspection by this office.

- 3. The analytical procedures for the NPDES Permit were reviewed during the inspection. It was understood that Ed Shultz uses a portable pH meter to analyze the noncontact cooling water discharged through outfall 001. During the inspection, we discussed the requirement to periodically calibrate the portable meter using three different buffer

solutions. The buffer solutions that should be used should have a pH of 3, 7 and 10 su in order to cover the limit range of 6.5 to 9.0 su. The date and results of the meter calibration event must be recorded and be available upon request.

IDP No. 3DP00027

4. The sampling location for the discharge of contact cooling water was inspected. Bonnie Smail indicated that the discharge location included all wastewater discharged to the Killbuck POTW, including restroom waste. The sampling location includes flow monitoring. It was understood that flow is recorded daily by Mr. Shoutlz.
5. Ream and Haager conducts sampling and analytical services for Sperry and Rice. The sampling procedures were discussed and the Chain of Custody form for one sampling event was reviewed. The Chain of Custody form included the parameter sampled, the type of sample used for each parameter, and the preservatives used for each parameter. The Chain of Custody form stated that oil and grease was sampled using a grab sample, the metals were sampled using composite samples, and it appeared that a grab sample was collected for pH. It appeared that the pH sample may have been immediately analyzed on site; however, it was agreed that the sampling and analytical procedures for pH would be confirmed with Ream and Haager. The preservatives identified for each parameter included sulfuric acid for oil and grease, and nitric acid for metals.
6. Ms. Smail stated that sampling procedures were reviewed with Ream and Haager a few weeks prior to this inspection. You had indicated that Ream and Haager stated that the composite sampler, tubing and sample bottles are cleaned or replaced with new material prior to each sample event. Additional information that needs to be confirmed with Ream and Haager is as follows:
 - a. Oil and grease must be collected directly from the waste stream flowing through the sanitary sewer. Oil and grease must be directly collected in only glass bottles to be transported to the laboratory and may not be transferred from one sample container to another.
 - b. The pH must be collected using only grab samples and must be analyzed within 15 minutes of collection, using a properly calibrated pH meter. Bonnie indicated that Sperry and Rice may start to do the pH analysis for pretreatment monitoring.

Compliance Review

A compliance review for both permits was conducted as part of this inspection. The period of review for IDP No. 3DP00027 was January 2008 through March 2012. No limit violations were reported; however, a number of reporting violations were observed during the compliance review. The violations are included in Attachment 1. The reporting violations for IDP No. 3IR00050 reinforce the concerns noted above in Item 1.

A compliance review was also completed for NPDES Permit No. 3IR00050. The period of review ranges from July 2011 through March 2012. No limit or frequency violations were identified during the compliance review since the record was updated following the most recent inspection. However, be advised that submitting monitoring reports after the due date each month is also considered a violation of the NPDES Permit.

Be advised that failure to report in accordance with either the NPDES Permit or the IDP is a violation of Ohio Revised Code (ORC) 6111.07. Such violations are subject to enforcement

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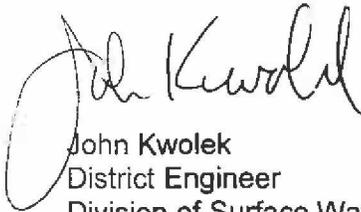
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action. Sperry and Rice must develop procedures that will enable the company to provide consistent reporting in accordance with the NPDES and IDP permits.

You may contact this office at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions regarding this inspection report.

Respectfully,

A handwritten signature in black ink, appearing to read "John Kwolek". The signature is written in a cursive style with a large initial "J".

John Kwolek
District Engineer
Division of Surface Water

JK/cs

cc. Bonnie Smail, QA / Engineering Manager, Killbuck Plant, Sperry & Rice Manufacturing Company, LLC

Attachment 1 – Reporting violations for IDP No. 3PD00027

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2008	CBOD 5 day	1/2Weeks	1	0	04/22/2008
December 2008	CBOD 5 day	1/2Weeks	1	0	12/16/2008
February 2008	CBOD 5 day	1/2Weeks	1	0	02/12/2008
January 2008	CBOD 5 day	1/2Weeks	1	0	01/29/2008
January 2008	CBOD 5 day	1/2Weeks	1	0	01/15/2008
January 2008	CBOD 5 day	1/2Weeks	1	0	01/01/2008
July 2008	CBOD 5 day	1/2Weeks	1	0	07/01/2008
June 2008	CBOD 5 day	1/2Weeks	1	0	06/03/2008
May 2008	CBOD 5 day	1/2Weeks	1	0	05/06/2008
November 2008	CBOD 5 day	1/2Weeks	1	0	11/04/2008
October 2008	CBOD 5 day	1/2Weeks	1	0	10/07/2008
September 2008	CBOD 5 day	1/2Weeks	1	0	09/23/2008
April 2008	COD	1/2Weeks	1	0	04/22/2008
April 2009	COD	1/2Weeks	1	0	04/23/2009
August 2009	COD	1/2Weeks	1	0	08/26/2009
August 2009	COD	1/2Weeks	1	0	08/12/2009
August 2011	COD	1/2Weeks	1	0	08/26/2011
December 2008	COD	1/2Weeks	1	0	12/16/2008
December 2009	COD	1/2Weeks	1	0	12/02/2009
December 2009	COD	1/2Weeks	1	0	12/16/2009
February 2008	COD	1/2Weeks	1	0	02/12/2008
February 2009	COD	1/2Weeks	1	0	02/12/2009
February 2011	COD	1/2Weeks	1	0	02/26/2011
January 2008	COD	1/2Weeks	1	0	01/01/2008
January 2008	COD	1/2Weeks	1	0	01/29/2008
January 2008	COD	1/2Weeks	1	0	01/15/2008
January 2009	COD	1/2Weeks	1	0	01/15/2009
January 2011	COD	1/2Weeks	1	0	01/01/2011
January 2011	COD	1/2Weeks	1	0	01/29/2011
July 2008	COD	1/2Weeks	1	0	07/01/2008
July 2009	COD	1/2Weeks	1	0	07/01/2009
July 2009	COD	1/2Weeks	1	0	07/29/2009
July 2010	COD	1/2Weeks	1	0	07/29/2010
July 2011	COD	1/2Weeks	1	0	07/29/2011
July 2011	COD	1/2Weeks	1	0	07/01/2011
June 2008	COD	1/2Weeks	1	0	06/03/2008
March 2009	COD	1/2Weeks	1	0	03/12/2009
March 2011	COD	1/2Weeks	1	0	03/12/2011
May 2008	COD	1/2Weeks	1	0	05/06/2008
November 2008	COD	1/2Weeks	1	0	11/04/2008
November 2009	COD	1/2Weeks	1	0	11/18/2009
November 2009	COD	1/2Weeks	1	0	11/04/2009
October 2008	COD	1/2Weeks	1	0	10/07/2008
October 2009	COD	1/2Weeks	1	0	10/21/2009
September 2008	COD	1/2Weeks	1	0	09/23/2008
September 2009	COD	1/2Weeks	1	0	09/09/2009

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September 2011	COD	1/2Weeks	1	0	09/23/2011
April 2008	Flow Rate	1/2Weeks	1	0	04/22/2008
April 2009	Flow Rate	1/2Weeks	1	0	04/23/2009
August 2009	Flow Rate	1/2Weeks	1	0	08/12/2009
August 2009	Flow Rate	1/2Weeks	1	0	08/26/2009
August 2011	Flow Rate	1/2Weeks	1	0	08/26/2011
December 2008	Flow Rate	1/2Weeks	1	0	12/16/2008
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January 2008	Flow Rate	1/2Weeks	1	0	01/01/2008
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January 2011	Flow Rate	1/2Weeks	1	0	01/01/2011
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October 2009	Flow Rate	1/2Weeks	1	0	10/21/2009
September 2008	Flow Rate	1/2Weeks	1	0	09/23/2008
September 2009	Flow Rate	1/2Weeks	1	0	09/09/2009
September 2011	Flow Rate	1/2Weeks	1	0	09/23/2011
April 2008	Lead, Total (Pb)	1/2Weeks	1	0	04/22/2008
April 2009	Lead, Total (Pb)	1/2Weeks	1	0	04/23/2009
August 2009	Lead, Total (Pb)	1/2Weeks	1	0	08/12/2009
August 2009	Lead, Total (Pb)	1/2Weeks	1	0	08/26/2009
August 2011	Lead, Total (Pb)	1/2Weeks	1	0	08/26/2011
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January 2008	Lead, Total (Pb)	1/2Weeks	1	0	01/15/2008

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January 2009	Lead, Total (Pb)	1/2Weeks	1	0	01/15/2009
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September 2009	Lead, Total (Pb)	1/2Weeks	1	0	09/09/2009
September 2011	Lead, Total (Pb)	1/2Weeks	1	0	09/23/2011
April 2008	O&G	1/2Weeks	1	0	04/22/2008
April 2009	O&G	1/2Weeks	1	0	04/23/2009
August 2009	O&G	1/2Weeks	1	0	08/12/2009
August 2009	O&G	1/2Weeks	1	0	08/26/2009
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July 2009	O&G	1/2Weeks	1	0	07/01/2009
July 2009	O&G	1/2Weeks	1	0	07/29/2009
July 2010	O&G	1/2Weeks	1	0	07/29/2010
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March 2009	O&G	1/2Weeks	1	0	03/12/2009
March 2011	O&G	1/2Weeks	1	0	03/12/2011
May 2008	O&G	1/2Weeks	1	0	05/06/2008
November 2008	O&G	1/2Weeks	1	0	11/04/2008
November 2009	O&G	1/2Weeks	1	0	11/18/2009

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October 2008	O&G	1/2Weeks	1	0	10/07/2008
October 2009	O&G	1/2Weeks	1	0	10/21/2009
September 2008	O&G	1/2Weeks	1	0	09/23/2008
September 2009	O&G	1/2Weeks	1	0	09/09/2009
September 2011	O&G	1/2Weeks	1	0	09/23/2011
April 2008	pH, Minimum	1/2Weeks	1	0	04/22/2008
April 2009	pH, Minimum	1/2Weeks	1	0	04/23/2009
August 2009	pH, Minimum	1/2Weeks	1	0	08/12/2009
August 2009	pH, Minimum	1/2Weeks	1	0	08/26/2009
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December 2008	pH, Minimum	1/2Weeks	1	0	12/16/2008
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December 2009	pH, Minimum	1/2Weeks	1	0	12/02/2009
February 2008	pH, Minimum	1/2Weeks	1	0	02/12/2008
February 2009	pH, Minimum	1/2Weeks	1	0	02/12/2009
February 2011	pH, Minimum	1/2Weeks	1	0	02/26/2011
January 2008	pH, Minimum	1/2Weeks	1	0	01/01/2008
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September 2008	pH, Minimum	1/2Weeks	1	0	09/23/2008
September 2009	pH, Minimum	1/2Weeks	1	0	09/09/2009
September 2011	pH, Minimum	1/2Weeks	1	0	09/23/2011
January 2008	TTOs	2/Year	1	0	01/01/2008
January 2009	TTOs	1/6Months	1	0	01/01/2009
January 2011	TTOs	1/6Months	1	0	01/01/2011
July 2008	TTOs	2/Year	1	0	07/01/2008
July 2009	TTOs	1/6Months	1	0	07/01/2009
July 2010	TTOs	1/6Months	1	0	07/01/2010
July 2011	TTOs	1/6Months	1	0	07/01/2011
April 2008	Zinc, Total (Zn)	1/2Weeks	1	0	04/22/2008
April 2009	Zinc, Total (Zn)	1/2Weeks	1	0	04/23/2009

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