



**Environmental
Protection Agency**

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

April 30, 2012

Robert Feltz
Keihin Thermal Technology Corporation of America
10500 O'Day Harrison Road
P.O. Box 10
Mount Sterling, OH 43143

**Re: Industrial User Pretreatment Inspection
Keihin Thermal Technology Corporation of America / Madison County
Ohio EPA Indirect Discharge Permit 4DP00008*HP**

Dear Mr. Feltz:

Thank you for taking time to meet with me on Tuesday, April 24, 2012. The purpose of the site visit was to review Keihin Thermal Technology Corporation of America (Keihin) compliance with the Ohio EPA indirect discharge permit conditions, pretreatment and industrial storm water requirements. Attached you will find my report and observations from the site visit. A brief summary of the findings include:

1. Keihin has submitted the required semi-annual self-monitoring reports according to the conditions stated in the Ohio EPA indirect discharge permit for the inspection period of March 1, 2010 through April 1, 2012.
2. No effluent, code or frequency violations were noted. The Ohio EPA database shows 98 frequency violations. A review of Keihin files showed that they were compliance with their permit. Ohio EPA staff will determine cause of our database error.
3. Operation of the wastewater treatment system appeared satisfactory at the time of the inspection. The pretreatment system, as well as, the monitoring system and redundant pH probes were working well.
4. Keihin had submitted an Ohio EPA indirect discharge permit modification application on October 14, 2010. The modified permit was issued effective on December 1, 2011, and expires on November 30, 2016. The modified permit was re-issued again on April 20, 2012, at Keihin's request due to a name change of the facility.
5. The Village of Mt. Sterling wastewater treatment plant operator, Chris Beaver, stated that they did not have any issues with Keihin's discharge or any other industrial user's discharge.
6. Robert Feltz, manager of Environmental and Safety, holds a Class I wastewater treatment plant operator license.

7. Dusty Miller, pretreatment system operator, holds a Class I wastewater treatment plant operator license. Mr. Miller continues to improve the efficiency of the treatment system and is able to achieve a high degree of treatment and percent solids.
9. Critical inventory supplies list reviewed during inspection. There is an adequate supply of probes, meter & pumps. The critical inventory supplies list and maintenance schedule is updated monthly.
10. The pH probe cleaning and calibration log reviewed during inspection. Weekly cleaning & calibration completed.
11. The most current SPCC plan, dated March 5, 2012, briefly reviewed. The SPCC plan appeared adequate and a copy was kept for Ohio EPA's file. They have the plan due to generating greater than 1,000 kg of hazardous waste per month and it is stored less than 90 days. Also, they store greater than 1,320 gallons of oil on site.
12. Five years of data kept on-site. Monitoring reports since last inspection were reviewed.
13. Keihin is ISO 14001 certified.
14. The production line that discharges directly to the pH adjustment tank was inspected. There were no concerns with this production line continuing to discharge directly to the pH adjustment tank and not going through the flocculation tank.

There are no required actions as a result of the indirect discharge permit inspection. The Ohio EPA looks forward to working with Keihin to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by e-mail at greg.sanders@epa.state.oh.us or phone at (614) 728-3852.

Sincerely,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: Ryan Laake CO/DSW, w/enclosure
Chris Beaver Village of Mount Sterling WWTP

OhioEPA

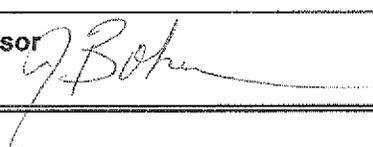
State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000143		FACILITY PERMIT NUMBER 4DP00008*HP		DATE CONDUCTED 4/24/2012	
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2	TIME IN 10:00 am	TIME OUT 11:30 pm	

GENERAL INFORMATION	
Name and Location of Facility Keihin Thermal Technology Corporation of America 10500 O'Day Harrison Road P.O. Box 10 Mt. Sterling, Ohio 43143	POTW Receiving Discharge Village of Mount Sterling
Mailing Address of Facility same	Categorical Standard(s) or other Classification Categorical Industrial User (CIU) Combined Waste Formula: Metal Finishing 40 CFR 433 and Aluminum Forming 40 CFR 467
Contact (Name/Title/Phone) Robert Feltz Mgr. E&S 740.869.5025	Other Notes: Other Facility Pretreatment Contacts Dusty Miller, WWTP Operator - Keihin Brian Tornes, Burgess & Niple, Environmental Consultant

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
S	General Facility Operation Facility very well-maintained at time of site visit. Files well organized.	S	Pretreatment System System components observed to be properly operating during site visit, including ORP and pH controls. Effluent had no visible solids, or oil and grease. Continue to improve on plant efficiency.
S	Permit Compliance (Effluent Limitations) No violations were noted.	S	Self-Monitoring and Reporting Reports received as specified in permit. Production data reported as required.

Name and Signature of Inspector	Agency / Office / Telephone	Date
Gregory Sanders 	OEPA/DSW/CDO/(614)728-3851	4-27-12
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor 	OEPA/DSW/CDO/(614)728-3841	4-27-12

INDUSTRIAL USER INSPECTION CHECKLIST

Keihin Technology Thermal Corporation of America

Tuesday, April 24, 2012

1.0 COMPLIANCE

* Does the facility have an effective permit? **Yes, Indirect Discharge Permit (IDP) #4DP00008*EP. Modified permit effective on December 1, 2011, and expires November 30, 2016. Another modification was issued with a facility name change on April 20, 2012. Only the first page of the permit was modified.**

* Since the last inspection, is the facility in compliance with its permit limits? If no, explain: **Yes, in compliance. Only issue was that on April 1, 2012, Keihin had a sanitary line clogged. This sanitary line only contained domestic sewage and did not discharge to the pretreatment system. Village treatment plant staff helped unclog the line.**

* Is the facility in compliance with all other requirements?

Sampling procedure	Y / N / NA
Reporting (late reporting, failure to report, etc.)	Y / N / NA
Compliance Schedule	Y / N / NA
Submitted BMR	Y / N / NA
Any other requirement	Y / N / NA

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

* Was the facility required to perform any action as a result the previous inspection? **Y / N**
If yes, has the facility completed those action(s)

If no, explain:

2.0 FACILITY OPERATIONAL CHARACTERISTICS

General Facility Description and Operations: **Keihin purchased SHOWA in 2010. The facility stayed the same as before. The Keihin facility manufacturers aluminum condensers, evaporators and other parts for the automotive industry (Tier Two supplier to Honda, VW others). Also, the facility manufactures aluminum tubes and other parts for copiers. Aluminum forming processes include extrusion. Metal finishing processes include aqueous degreasing, zinc coating and chromate conversion coating. May expand facility in next few years. Dusty Miller, pretreatment system operator, is currently drafting O&M manual for pretreatment system.**

Employees: **380 w/temps** Shifts/Day: **3 shifts per day** Production Days/Year: **250 - 5/days week typical**

Any production changes since the last inspection? **Y / N**
If Yes, explain:

Production increasing, now at three shifts per day. Pretreatment system has good operation which allows the pretreatment system to maintain a high degree of treatment and good effluent and sludge results.

Any expansion or production increase expected within the next year? **Y / N**
If Yes, explain: **Keihin may expand in next year or two.**

3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes): **See File for IDP and PTI applications.**

* List all processes generating wastewater as well as their previous (those that the permit limits are based on) and current wastewater flows and production rates. **See Also IDP and PTI Applications.**

PROCESS	WASTEWATER FLOW (gpm)		PRODUCTION DATA	
	A/C	MAX	permit	current
1. EVAP Conversion Coat	25,000	32,000		
2. COND Conversion Coat	16,000	35,000		
3. Aqueous Degreaser #1	6,800	7,200		
4. Aqueous Degreaser #2	6,800	7,200		
5. Gross Leak (EVAP)	11,520	23,040		
6. Gross Leak (COND)	8,640	17,820		
7. Flux Load (COND)	50	685		
8. Extrusion Die Cleaning	85	180	7,500 kg/day	(same)
9. Extrusion/Cooling Reject Water	660	4,580	7,500 kg/day	(same)
TOTAL	75,555	127,705		

Are all the flows discharged to the POTW?
If no, explain:

Y / N

Are all the flows present at the sampling location?

Y / N

If no, which flows are not present: **Sanitary flow is not present at sample location as well as dilute flows such as boiler blowdown, cooling water reject, demineralizer backwash. Note: a portion of the RO reject is no being reused as initial rinse in cleaning process.**

How does the current production rate compare with the production rate used to develop the facilities permit limits? **The flows are much lower. Since 2011, the discharge flows have averaged around 35,000 gallons per day.**

4.0 WASTEWATER TREATMENT

* Describe the wastewater treatment system:

See previous OEPA PTIs including #01- 10057 (2002) for zirconium treatment; #01-1657 (1987) for metals removal; OEPA PTI#01-6261 (1996) for chrome removal; and PTI #01-7202 (1997) for increased flows. pH and ORP controls observed to be operating satisfactory at time of site visit. TD-03 Cr. Tank ORP = 222 mv. TD-10 Treatment Tank for metal precipitation, pH = 9.34; TD-11 Final pH Tank, pH = 6.57. TD-14 tank for pH adjustment, pH = 6.89.

* Was a PTI issued for the treatment system?

Y / N

What is the treatment mode of operation?

Batch / Continuous / Combination

If batch, list frequency and duration:

Is there a full-time wastewater treatment operator? Yes, training provided yearly to staff.

Y / N / NA

If no, how often is treatment system checked?

Is there an operations and maintenance manual?

Y / N / NA

Is an inventory of critical spare parts maintained?

Y / N / NA

Are there any bypasses in the system?

Y / N / NA

If yes, location:

Method of sludge disposal: Currently, hauled by Envirosafe, but may change hauler in future.

Name of sludge hauler: Envirosafe.

Frequency and amount of disposal: Hauls every 8 weeks, records show hauling on 2-16-11, 5-5-11, 7-12-11, 9-21-11, 11-29-11 and 2-9-12. A total of 444.9 tons of sludge cake hauled in 2011. Keihin continues to improve efficiency of the treatment system and are able to achieve high degree of treatment and percent solids.

Is any sludge generated subject to RCRA regulations?

F-Listed F019 (Al conv. coat), will request to be de-listed.

Y / N

5.0 TOXICS MANAGEMENT

Are any TTOs used in the facility?

Y / N

(Note: Powder coating painting used/no solvents)

If yes, identify TTOs: Methylene chloride vapor and trichloroethylene vapor degreasing eliminated from plant. No Cr at facility anymore.

Does the facility have a current SPCC Plan? Yes, evaluated most recent plan dated March 5, 2012.

Does the facility have a current TOMP?

Y / N / NA

Facility samples for TTOs. No past TTO permit limit violations.

TTO sampling on March 7, 2012, by Belmont Labs show most all TTOs below detection limits.

Facility continues to use "Chemical Acquisition Program" for TTO use/approval.

If yes, is it being implemented?

Does the facility need a plan to control slug loads? See notes below.

Y / N

* If yes, does the facility have a plan?

Y / N

If yes, is it being implemented?

Y / N

Identify any potential spill areas: No changes from previous inspections. Facility has adequately addressed potential spills/slug loading through SPCC activities. Measures include containment diking around all large tanks in process areas and wastewater treatment. Dedicated chemical storage cabinets with containment are in use. Drum containment pallets in use. Periodic staff training and spill exercises conducted.

6.0 SELF-MONITORING

* Sampling location described in their permit. **Weir box of the final pH adjustment tank.**
Effluent observed had no color and minimal foam. No unusual conditions (including oil/grease, solids) noted.
Composite sampling observed at time of inspection.

Is the facility sampling at the location described in their permit? Y / N / NA
If no, described the sampling location:

Is the sampling location representative? Y / N
If no, indicate a representative location:

Are all connections to the sewer monitored? Y / N
If yes, explain:

Is the flow measured or estimated? M / E

If measured, when was flow meter last calibrated? **June 17, 2011, by Burgess & Niple**
A Hach-GLI Ultrasonic flow analyzer is used and calibrated yearly.

Is pH measured with a pH meter? Y / N
If yes, how often is the meter calibrated? **Weekly.**

Is pH continuously monitored? Y / N

Does the facility collect its own samples? Y / N
ISCO Model 3710 Portable Composite Sampler used.

Does the facility follow appropriate sampling procedures?

* Monitoring frequencies? Y / N

* Sample collection (grab=pH, CN, VOC) Y / N

Flow proportioned samples? Y / N

Proper preservation techniques? Y / N

Sample holding times? Y / N

Chain-of-custody forms? Y / N

Are samples analyzed according to 40 CFR 136? Y / N

Laboratory conducting analyses: **Changed to Belmont Labs in 2011.**

7.0 OTHER OBSERVATIONS/NOTES

1. Keihin has submitted the required semi-annual self-monitoring reports according to the conditions stated in the Ohio EPA indirect discharge permit for the inspection period of March 1, 2010 through April 1, 2012.
2. No effluent, code or frequency violations were noted. The Ohio EPA database shows 98 frequency violations. A review of Keihin files showed that they were compliance with their permit. Ohio EPA staff will determine cause of our database error.
3. Operation of the wastewater treatment system appeared satisfactory at the time of the inspection. The pretreatment system, as well as, the monitoring system and redundant pH probes were working well.
4. Keihin had submitted an Ohio EPA indirect discharge permit modification application on October 14, 2010. The modified permit was issued effective on December 1, 2011, and expires on November 30, 2016. The modified permit was re-issued again on April 20, 2012, at Keihin's request due to a name change of the facility.
5. The Village of Mt. Sterling wastewater treatment plant operator, Chris Beaver, stated that they did not have any issues with Keihin's discharge or any other industrial user's discharge.
6. Robert Feltz, manager of Environmental and Safety, holds a Class I wastewater treatment plant operator license.
7. Dusty Miller, pretreatment system operator, holds a Class I wastewater treatment plant operator license. Mr. Miller continues to improve the efficiency of the treatment system and is able to achieve a high degree of treatment and percent solids.
9. Critical inventory supplies list reviewed during inspection. There is an adequate supply of probes, meter & pumps. The critical inventory supplies list and maintenance schedule is updated monthly.
10. The pH probe cleaning and calibration log reviewed during inspection. Weekly cleaning & calibration completed.
11. The most current SPCC plan dated March 5, 2012, briefly reviewed. The SPCC plan appeared adequate and a copy was kept for Ohio EPA's file. They have the plan due to generating greater than 1,000 kg of hazardous waste per month and it is stored less than 90 days. Also, they store greater than 1,320 gallons of oil on site.
12. Five years of data kept on-site. Monitoring reports since last inspection were reviewed.
13. Keihin is ISO 14001 certified.
14. The production line that discharges directly to the pH adjustment tank was inspected. There were no concerns with this production line continuing to discharge directly to the pH adjustment tank and not going through the flocculation tank.

8.0 REQUIRED FOLLOW-UP ACTIONS – None