



Environmental  
Protection Agency

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

April 30, 2012

Don Bowsher  
Stephens Pipe and Steel  
10732 Schadel Road S.E.  
P.O. Box 237  
Mount Sterling, OH 43143

**Re: Industrial User Pretreatment Inspection  
Stephens Pipe and Steel, Madison County  
Ohio EPA Indirect Discharge Permit #4DP00012\*BP**

Dear Mr. Bowsher:

Thank you for taking time to meet with me on April 24, 2012. The purpose of the meeting was to conduct a facility pretreatment inspection to evaluate compliance with the current Ohio EPA Indirect Discharge Permit conditions and pretreatment requirements. The inspection period includes March 1, 2010 through April 1, 2012. Attached you will find my report and observations from the site visit. The following actions were identified.

1. Stephens Pipe and Steel had two zinc violations since the last pretreatment inspection dated February 17, 2010. The two zinc violations were on April 21, 2011 and May 12, 2011. No other violations were noted.
2. Regular maintenance is being performed on the pretreatment system and its appurtenances.
3. You requested information regarding your industrial storm water permit. You wanted to know if you need to conduct quarterly or monthly sampling. This will be forwarded under separate cover letter.
4. You requested information regarding the general discharge permit for non-contact cooling water. The following weblink will provide information on this general permit:  
[http://www.epa.ohio.gov/dsw/permits/GP\\_NonContactCoolingWater.aspx](http://www.epa.ohio.gov/dsw/permits/GP_NonContactCoolingWater.aspx).

Don Bowsher  
Stephens Pipe and Steel  
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Ohio EPA looks forward to working with Stephens Pipe and Steel 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](mailto:greg.sanders@epa.state.oh.us) or phone at (614) 728-3851.

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, w/enclosure

# OhioEPA

## PRETREATMENT INSPECTION REPORT

State of Ohio Environmental Protection Agency

NPDES PERMIT NUMBER <b>OHP000147</b>	FACILITY PERMIT NUMBER <b>4DP00012*BP</b>	DATE CONDUCTED <b>4-24-2012</b>
INSPECTION TYPE <b>I</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>2</b>
	TIME IN <b>1:00 pm</b>	TIME OUT <b>2:40 pm</b>

<b>GENERAL INFORMATION</b>	
Name and Location of Facility <b>Stephens Pipe and Steel 10732 Schadel Road SE P.O. Box 237 Mount Sterling, OH 43143</b>	POTW Receiving Discharge <b>Village of Mount Sterling</b>
Mailing Address of Facility <b>same</b>	Categorical Standard(s) or other Classification <b>Categorical Industrial User (CIU) 40 CFR 420 Zinc Galvanizing &amp; Local Limits</b>
Contact (Name/Title/Phone) <b>Don Bowsher 740.869.2257</b>	Other Notes: <b>IDP expires May 31, 2013.</b>

<b>FACILITY EVALUATION</b> (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
<b>S</b>	<b>General Facility Operation - Facility well maintained at time of site visit.</b>	<b>S</b>	<b>Pretreatment System - appeared satisfactory at time of site visit.</b>
<b>S</b>	<b>Permit Compliance (Effluent Limitations) - Two zinc violations noted on 4/21/2011 &amp; 5/12/2011 (TRC).</b>	<b>S</b>	<b>Self-Monitoring and Reporting - Reports received as specified in permit. Production data reported as required.</b>

Name and Signature of Inspector <b>Gregory L. Sanders</b> 	Agency / Office / Telephone <b>OEPA/DSW/CDO/(614)728-3851</b>	Date <b>4-27-12</b>
Signature of Reviewer <b>Jeff Bohne, Supervisor; Water Quality</b> 	Agency / Office <b>OEPA/DSW/CDO/(614)728-3841</b>	Date <b>4/27-12</b>

# INDUSTRIAL USER INSPECTION CHECKLIST

Stephens Pipe and Steel

Tuesday, April 24, 2012

## 1.0 COMPLIANCE

\* Does the facility have an effective permit? **Yes, Indirect Discharge Permit (IDP) #4DP00012\*BP. Effective June 1, 2008. Expires May 31, 2013.**

\* Since the last inspection, is the facility in compliance with its permit limits? **Yes, except for two permit excursions for zinc on April 21, 2011 and May 12, 2011. This places the industry in technical review criteria. The violations were due to staff not properly cleaning the sludge press. A log has been put in place that requires staff sign and date after they inspect the sludge press.**

\* 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: Fence making

Number of Employees: 144      Shifts/Day: 3      Production Days/Year: 22/mn or 260/yr

**Yearly average - 144 employees**

Any production changes since the last inspection?

Y /  N

If Yes, explain:

Any expansion or production increase expected within the next year?

Y /  N

If Yes, explain: **Production is starting to increase a little over last year.**

### 3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes):

\* 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.

PROCESS	WASTEWATER FLOW (gpd)		PRODUCTION DATA	
	AVG	MAX	permit	current
<b>Industrial</b>	<b>8152</b>	<b>33851</b>		
<b>TOTAL</b>	<b>8152</b>	<b>33851</b>		

Are all the flows discharged to the POTW?

Y / N

If no, explain:

Are all the flows present at the sampling location?

Y / N

If no, which flows are not present:

How does the current production rate compare with the production rate used to develop the facilities permit limits? **50.0 million pounds per year; April, May & June is their usual busy time of year. This is approximately a 20% increase in production since the last inspection.**

#### 4.0 WASTEWATER TREATMENT

\* Describe the wastewater treatment system:

\* Was a PTI issued for the treatment system?

/ N

What is the treatment mode of operation?

/ Continuous / Combination

If batch, list frequency and duration: **Once per week**

Is there a full-time wastewater treatment operator?

/ N / NA

If no, how often is treatment system checked?

Is there an operations and maintenance manual?

/ N / NA

Is an inventory of critical spare parts maintained?

/ N / NA

Are there any bypasses in the system?

/ N / NA

If yes, location:

If yes, have bypasses occurred since last inspection?

/ N / NA

If yes, was the POTW notified?

Method of sludge disposal:

Name of sludge hauler: **US Zinc hauls zinc two times per month. Ritcher Metals also hauls skims once per month. The wire drawing lubricant is the only waste that is taken to landfill and not recycled.**

Frequency and amount of disposal: **See above.**

Is any sludge generated subject to RCRA regulations?

/ N

#### 5.0 TOXICS MANAGEMENT

Are any TTOs used in the facility?

/ N

If yes, identify TTOs:

Does the facility have a current SPCC Plan? **Yes**

Does the facility have a current TOMP? .

/  / NA

If yes, is it being implemented?

Does the facility need a plan to control slug loads?

/

\* If yes, does the facility have a plan?

If yes, is it being implemented?

Identify any potential spill areas: **Loading dock, but it is located inside of building and slopes into building.**

## 6.0 SELF-MONITORING

- \* Sampling location described in their permit.  
Is the facility sampling at the location described in their permit?  / N / NA  
If no, described the sampling location:
- Is the sampling location representative?  / N  
If no, indicate a representative location:
- Are all connections to the sewer monitored?  / N  
If yes, explain:
- Is the flow measured or estimated?  / E  
If measured, when was flow meter last calibrated?
- Is pH measured with a pH meter?  / N  
If yes, how often is the meter calibrated? **Annually**
- Is pH continuously monitored?  / N
- Does the facility collect its own samples?  / N  
If no, who collects the samples?
- Does the facility follow appropriate sampling procedures?
- \* Monitoring frequencies?  / N
- \* Sample collection (grab=pH, CN, VOC)  
Flow proportioned samples?  / N  
Proper preservation techniques?  / N  
Sample holding times?  / N  
Chain-of-custody forms?  / N  
Are samples analyzed according to 40 CFR 136?  / N
- Laboratory conducting analyses: **Jones & Henry**

## 7.0 OTHER OBSERVATIONS/NOTES

The company is addressing the storm water issues that they had with an adjacent property. Storm water was backing up onto their property. Stephens Pipe and Steel installed drainage tile throughout their property and around the perimeter of their property. Drainage swales were installed on their property to capture and store additional storm water. Additional work will be done to manage the storm water at their site.

Regular maintenance is performed on industrial pretreatment system including pumps and filter press. Maintenance log reviewed.

Monthly operating reports reviewed at facility.

The sludge press plates were not cleaned as often as needed in order to prevent zinc violations. A log was created that requires staff to sign and date that the sludge press plates were inspected and cleaned if necessary.

The Village of Mt. Sterling wastewater treatment plant operator, Chris Beaver, stated that they did not have any issues with the discharge from Stephen's Pipe and Steel.

## 8.0 REQUIRED FOLLOW-UP ACTIONS

No required follow-up actions.