



Environmental
Protection Agency

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

March 23, 2012

Don Hock
Superior Fibers, Inc.
499 North Broad Street
Bremen, OH 43107

Re: Superior Fibers, Inc., Fairfield County
Indirect Discharge Permit 4DP000011*BP

Dear Mr. Hock:

Thank you for taking time to meet with me on Friday, February 24, 2012. The purpose of the site visit was to evaluate your compliance with Ohio EPA indirect discharge permit conditions and pretreatment requirements. During the site visit we also discussed industrial storm water issues.

Attached you will find my report and observations from the site visit. The following items were identified.

1. The new pretreatment system has been on-line since October 2008 and the effluent is being discharged to Bremen WWTP at this time. The new pretreatment system appeared to be well operated and maintained.
2. Three permit violations were noted during the inspection time frame of June 2010 through January 2012. An oil & grease violation on 8/23/2010 and two ammonia nitrogen violations on 1/19/11 and 2/23/11.
3. A review of Superior Fiber's monthly operating reports show that the average carbonaceous biochemical oxygen demand (CBOD5) concentration is 3,000 mg/l with a maximum of 5,470 mg/l and the average total suspended solids (TSS) concentration is around 500 mg/l with a maximum of 9,804 mg/l. CBOD5 and TSS concentrations are elevated. I am recommending a CBOD5 (1,500 mg/l) and TSS (4,000 mg/l) limit in your next industrial discharge permit. I am recommending that you have three years in the permit to achieve compliance with the permit limit.
4. A review of the Village of Bremen's WWTP monthly operating reports from June 2010 through January 2012 show one permit violation for TSS. Also, monthly operating reports for the Bremen WWTP show concerns for CBOD5 concentrations.
5. Drums stored outside should have secondary containment and be under roof. Empty drums stored outside should be stored upright with an enclosed lid.

6. There have been issues with groundwater contamination in the past. Superior Fibers have three wells, PW1, PW2 and PW3. PW1 and PW2 have contamination with volatile organic compounds (VOCs). There are concerns that the VOC's may cause degradation problems in the non-contact cooling water discharge. PW1 is not currently being used. PW2 is in production but is connected to an air stripper to remove VOCs. PW3 not being used at this time.

The following actions are required by Superior Fibers.

- Prepare for additional treatment of CBOD5 and TSS.
- An inspection of the outside of the facility revealed the need for an industrial storm water permit. Please see the following link: http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. You must submit an industrial storm water permit notice of intent within 45 days from the receipt of this correspondence.
- You will need to complete and operator of record form for the operator of the pretreatment system. The following link will direct you to the operator of record form. <http://www.epa.ohio.gov/dsw/opcert/opcert.aspx>.

Ohio EPA looks forward to working with Superior Fibers 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) 728-3851.

Sincerely,



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

Enclosure

c: Byron Bowersox, Bremen WWTP
Ryan Laake, DSW/CO

ec: Greg Sanders, DSW/CDO

OhioEPA

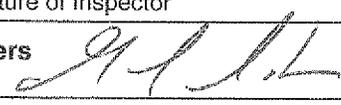
State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000150	FACILITY PERMIT NUMBER 4DP00011*BP	DATE CONDUCTED February 24, 2012		
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2	TIME IN 1:00 pm	TIME OUT 3:20 pm

GENERAL INFORMATION	
Name and Location of Facility Superior Fibers, Inc. 499 North Broad Street Bremen, OH 43107-0085	POTW Receiving Discharge Village of Bremen Byron Bowersox, Supt. Of Wastewater 1512 Webb Summit Road Bremen, OH 43107
Mailing Address of Facility same	Categorical Standard(s) or other Classification Significant Industrial User (SIU) Non-Categorical SIC - 3229 Pressed and Blown Glass NEC
Contact (Name/Title/Phone) Don Hock, Environmental, Health & Safety 740.569.4175	Other Notes: New pretreatment system on-line since October 2008 with secondary containment around system.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
S	General Facility Operation New WWTP on-line. Drums stored under roof and in secondary containment. Considering upgrades to WWTP for CBOD & TSS removal.	S	Pretreatment System Installation of new WWTP in October 2008. WWTP well operated and maintained.
S	Permit Compliance (Effluent Limitations) Three permit violations (O&G & 2 NH3-N) during the inspection time frame, June 1, 2010 through January 31, 2012.	S	Self-Monitoring and Reporting Monitor and reporting completed per permit. CBOD5 and TSS concentrations continued to be elevated, recommend limits in next permit.

Name and Signature of Inspector	Agency / Office / Telephone	Date
Gregory Sanders 	OEPA/DSW/CDO/(614)728-3851	2-28-12
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor 	OEPA/DSW/CDO/(614)728-3841	3-20-12

INDUSTRIAL USER INSPECTION CHECKLIST

Superior Fibers, Inc.
Friday, February 24, 2012

1.0 COMPLIANCE

* Does the facility have an effective permit? **Yes, Indirect Discharge Permit (IDP) #4DP00011*BP. Effective July 1, 2007 and expires June 30, 2012. You stated that you have already applied for the permit renewal.**

* Since the last inspection, is the facility in compliance with its permit limits? **No. If no, explain: Three permit violations during inspection time frame, 6/01/10 through 1/31/12. Oil & Grease violation on 8/23/10 of 183 mg/l (limit is 100 mg/l) and two ammonia nitrogen violations on 1/19/11 and 2/23/11, of 315 mg/l and 234 mg/l, respectively (limit is 200 mg/l). A new discharging pretreatment system was installed in October 2008 and discharges 104 feet due east of the original discharge manhole. CBOD5 and TSS concentrations continue to be elevated. Will recommend a permit limit of 1,500 mg/l for CBOD5 and 4,000 mg/l for TSS in the next permit with a three year interim limit for monitoring to achieve compliance with the limits.**

* 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: **No major changes since last inspection. Superior manufactures fiberglass filtration media including air filtration media and fiberglass reinforcement media. Raw material includes glass cullett, urea formaldehyde resin and colorants. Main processes include binder mixing, fiberglass spinning, procesing (finishing). Water used for non-contact cooling and general equipment & work area clean-up. Clean-up occurs continuously in Spin department and includes press-washing and drain cleaning.**

Number of Employees: **133** Shifts/Day: **3** Production Days/Year: **250 / 5 days a week**

Spin department generally works 24/7. Finishing department works 3 shifts per day. WWTS generally operated 24/7 approximately 24 days/month.

Any production changes since the last inspection? **Y / N**

If Yes, explain: **Yes, production increased from last year, at 80% of capacity.**

Any expansion or production increase expected within the next year? **Y / N**

If Yes, explain: **Need additional water, running out of water.**

3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes): **See attached schematic and also see file for IDP and PTI applications.**

binder mixing - fiberglass spinning - finishing (lay-up) - shipping final product

* 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 (gpd)		PERCENT OF PERMIT	
	AVG	MAX	Flow	Production
1. Fiberglass Spinning - in-line wash (Cleaning & scrubber blowdown)	4,650	5,760		
2. Sanitary (133 employees @ 35 gpd) (To Bremen WWTP)	4,655	5,530		
3. Non-Contact Cooling Water (NPDES Permit #4IN00053)	45,000	117,000		
TOTAL - 1& 2	8,975	11,290		

Are all the flows discharged to the POTW? **Y / N**

If no, explain: **Up to 117,000 gpd non-contact cooling water discharged to tributary of Rush Creek through Ohio NPDES #4IN00053*FD. This permit expires April 30, 2013. Reporting on NCCW had been maximum flow in permit instead of actual flow, requested to report actual flow.**

Are all the flows present at the sampling location? **Y / N**

If no, which flows are not present: **Sanitary flow is not present at sampling location. Non-contact cooling water currently discharged under separate discharge permit. Monthly reporting records reviewed at facility.**

How does the current production rate compare with the production rate used to develop the facilities permit limits? **No production-based permit limits in effect.**

Other items: **No changes to wells since last inspection. Superior Fibers has shut down PW1 well due to contamination. Currently using PW2 for non-contact cooling water. PW2 uses an air stripper to remove VOCs from the groundwater. PW3 well is currently off-line due to plant 2 production being shut down due to economy. PW3 does not appear to have the VOC plume in the groundwater.**

4.0 WASTEWATER TREATMENT

* Describe the wastewater treatment system: **New discharging pretreatment system installed in October 2008 and discharges 104 feet due east of original discharge manhole. The new pretreatment system includes a settling pit with an oil skimmer, sand and gravel filter bed, second oil skimmer at the end of filter bed, wastewater pumped to a storage tank, treated in a 300 gallon mix tank with sodium hydroxide, and an emulsion breaker (EB-40), pumped out of the mix tank to the treated wastewater storage tank, and then discharged to the Bremen WWTP. The system is electronically controlled, operated in batch and has secondary containment around the entire system. The amount of EB-40 added to system has been reduced to control foaming at Bremen's WWTP. They are discussing reduction of CBOD & TSS concentrations by chemical addition or biological treatment. Chemical addition may be done without a PTI approval, but installation of a biological treatment system may require a PTI approval.**

* Was a PTI issued for the treatment system? **Y / ~~N~~**

The most recent WWTP was built per PTI 01-11426, so no new PTI application was requested.

PTI 01-11426 (2007) Pretreatment system addition

PTI 01-1693 (1997) Pretreatment system

What is the treatment mode of operation? **~~Batch~~ / Continuous / Combination**

If batch, list frequency and duration: **Generally, WWTS staffed and operated by technicians on 1st shift and staffed by maintenance staff on 2nd & 3rd shifts. Pretreatment system discharges about 20 times per month.**

Is there a full-time wastewater treatment operator? **Y / ~~N~~ / NA**

If no, how often is treatment system checked? **Has daily operation oversight.**

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:

If yes, have bypasses occurred since last inspection?

If yes, was the POTW notified?

Method of sludge disposal: **Landfill by Big O Refuse.**

Name of sludge hauler: **Solids in settling pit pumped to drying bed. Solids taken to Tunnel Hill Landfill.**

Frequency and amount of disposal: **As necessary.**

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

5.0 TOXICS MANAGEMENT

Are any TTOs used in the facility?

Y / N

Facility reports no significant solvent usage. Resin and binders are water-based. Past wastewater sampling for organics indicated low concentrations of only a few select organics. Most TTOs are below detection.

If yes, identify TTOs: Does the facility have a current SPCC Plan? Facility no covered by 40 CFR 112.

Does the facility have a current TOMP?

Y / N / NA

If yes, is it being implemented?

Does the facility need a plan to control slug loads? No recent history of reported problems. 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: Pretreatment system has secondary containment. Facility trench drains from the inside of the plant remain partially uncovered in the outside plant areas leading to the pretreatment system. Most drums located outside are in secondary containment and under roof. Some drums will need to be stored in containment and under roof. Empty drums will need to be stored upright with a lid.

6.0 SELF-MONITORING

* Sampling location described in their permit. Sampling port installed in discharge line from treated wastewater storage tank to the sanitary sewer system. Sample taken at end of discharge line to on-site manhole.

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? Not evaluated

Y / N

If yes, explain:

Is the flow measured or estimated? Estimated by time elapsed meter.

M / E

If measured, when was flow meter last calibrated?

Is pH measured with a pH meter?

Y / N

If yes, how often is the meter calibrated? Monthly

Is pH continuously monitored?

Y / N

Does the facility collect its own samples?

Y / N

If no, who collects the samples?

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: TCCI Laboratories.

7.0 OTHER OBSERVATIONS/NOTES

1. New pretreatment system has been on-line since October 2008 and being discharged to Bremen WWTP at this time. The new pretreatment system discharges 104 feet due east of the original discharge manhole. Pretreatment system is well maintained and operated.
2. Three permit violations during inspection time frame, June 1, 2010 through January 31, 2012. Oil & Grease violation and two ammonia nitrogen violations..
3. A review of Superior Fiber's monthly operating reports show that the average CBOD5 concentration is 3,000 mg/l with a maximum of 5,470 mg/l. CBOD5 concentrations continue to be elevated. The average TSS concentration is around 500 mg/l with a maximum concentration of 9,804 mg/l. Recommend limits for CBOD5 and TSS in next permit with a three year interim limit with monitoring to achieve compliance with limit.
4. A review of the Village of Bremen's WWTP monthly operating reports from June 1, 2010 through January 31, 2012 should one permit violation for TSS. Monthly operating reports for the Bremen WWTP show concerns for CBOD5 concentrations.
5. Drums stored outside of the production facility should have secondary containment and be under roof. Empty drums should be stored upright with an enclosed lid.
6. Issues with groundwater contamination with VOCs causing potential degradation problems due to non-contact cooling water discharge. PW1 & PW2 has contamination. PW1 not being used. PW2 is in production but is connected to an air stripper to remove VOCs. PW3 not being used at this time due to economy and part of production line shut down.

8.0 REQUIRED FOLLOW-UP ACTIONS

1. Prepare for additional treatment for CBOD5 and TSS.
2. Inspection of the outside of the facility revealed the need for an industrial storm water permit. Please see attached link: http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. You must submit an industrial storm water permit notice of intent within 45 days from the receipt of this correspondence.
3. You will need to complete an operator of record form for the operator of the pretreatment system. The following link will direct you to the operator of record form. <http://www.epa.ohio.gov/dsw/permits/ocert/opcert.aspx>.