



Environmental
Protection Agency

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

May 14, 2012

**RE: Pretreatment Compliance Inspection and
Notice of Significant Non-Compliance**

Mr. Yog Singhal
Millat Industries Corporation, MPP Division
7611 Center Point, 70 Blvd.
Huber Heights, OH 45424

Dear Mr. Singhal:

On March 30, 2012, I met with Mr. Tom Meyers to conduct a Pretreatment Compliance Inspection of your facility's operations. The following issues necessitate your attention:

Reporting

In reviewing our records of your monitoring activity, I found that there was no Discharge Monitoring Report (DMR) for the period of July through December 2011. Millat has previously failed to submit DMRs, and failure to report is a cause for a finding of significant non-compliance (SNC).

In trying to sort out the missing/misreported information, James Roberts, of our Central Office, has recently provided you direction for correcting errors in past reports. It is necessary for you to make the needed corrections no later than May 25th. Please notify me when you have completed all the necessary corrections so I can review the reports.

From my conversation with Mr. Meyers, it is my impression that the process of entering analytical results into the DMR would be much simpler, and therefore less prone to reporting delays, if the analytical reports prepared by the laboratory were sent directly to you for entry.

An even simpler arrangement, and one that is very common, would be for the laboratory to enter the results into your DMR as the results became available. This is accomplished by authorizing the lab to have access to your DMR through the e-Business Center. They can enter data into a DMR, but only you can submit a report. Please let me know what changes you will make to keep reporting violations from happening in the future.

Records

Mr. Meyers had a very difficult time locating sampling and analytical records. Please note that these records are required to be kept at your facility. I recommend that all documentation (chain of custody form and analytical report) associated with monitoring results reported on DMRs be kept with the DMR at your facility. It would be ideal if all this information was bound together. Also, please note that it is necessary for you to keep a signed copy of the submitted DMR.

The analytical report I viewed from February 12, 2012 indicates that the client is Robertson, LLC. This does not provide sufficient proof that the results are associated with samples collected from Millat's discharge. Beginning with the chain of custody sheet, all documentation must clearly show that it is associated with monitoring performed at Millat.

Deposition of Stage 1 Wastewater

Since my previous inspection, your discharge permit no longer authorizes wastewater from Stage 1 of the paint line to be discharged to the sanitary sewer. Mr. Meyers indicated that this stage is now hauled for disposal off-site by Clean Waters Limited. To demonstrate that you are meeting this expectation, please include a note in the *General Comments* of the Discharge Monitoring Report (DMR) indicating whether Stage 1 was discharged to the sewer and whether the contents were hauled off-site for disposal.

Sampling Information

For several years now, I have called for you to record all of the following information on the chain of custody sheet:

- Date and time sampling started and stopped;
- Aliquot volume;
- Frequency of aliquot collection; and
- Final composite sample volume.

I do not understand why this simple documentation continues to be lacking; please find a solution and ensure all future chain of custody sheets contain this information.

Increased Flows

Beginning in October 2011, total flow has almost doubled and is well above the flows upon which your permit was based. Please explain what is contributing to this increase and whether it is expected to continue.

Mr. Yog Singhal
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Dilute Flows

Your permit requires dilute flow to be reported in units of gallons per day. However, you have instead reported a percentile value that appears to be associated with the total flow value. As has been a finding in previous inspections, dilute flow must be reported in gallons per day. You need to amend the DMRs for the periods of July through December 2010, January through June 2011 and July through December 2011 so that flow values are all in units of gallons per day. Please also ensure dilute flows for the current and future reporting periods are in terms of gallons per day.

TOMP Update

To continue to be able to submit certifications that Millat is implementing a Toxic Organics Management Plan (TOMP) in lieu of monitoring for total toxic organics (TTO), it is necessary for you to submit an update of the plan. You will need to schedule TTO monitoring sometime in the current reporting period ending June 30th and submit an updated TOMP to our Central Office. The TTO monitoring results will need to be submitted with the TOMP and reported on the DMR. Without an authorization from Ohio EPA to certify in lieu of monitoring TTOs, you will be obligated to monitor and report TTOs once every six-month reporting period. Please let me know how you plan to address this issue.

Please provide a written response to this letter by June 4, 2012 addressing the issues I have raised in this letter. If you have any questions concerning this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

Enclosures

cc: Ryan Laake - Ohio EPA / Central Office / DSW
Chuck Bauer - Clark County Department of Utilities

MW/ca



Environmental
Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER 1DP00050*BP	PERMIT APPLICATION NUMBER OHP000218	DATE CONDUCTED March 30, 2012
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2
	TIME IN 1120	TIME OUT 1215

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY Millat Industries Corp. - MPP Division 7611 Center Point 70 Blvd. Huber Heights, OH 45424	POTW RECEIVING DISCHARGE Clark County - Southwest Regional WWTP
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MAILING ADDRESS OF FACILITY
**Millat Industries Corp. - MPP Division
7611 Center Point 70 Blvd.
Huber Heights, OH 45424**

CONTACT (NAME/TITLE/PHONE/E-MAIL)
Mr. Tom Meyers / Maintenance Manager / (937) 535-1500 ext. 101 / tmyers@millatindustries.com

FACILITY EVALUATION (See Inspection letter for complete descriptions)

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

NE	Sampling Procedures	NA	Compliance schedule requirements
U	Reporting	S	Notification
U	Compliance with effluent limits		Other -

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 5-14-12
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Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date 5/15/12
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INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Millat Industries Corporation - MPP Division*

Date of inspection: *March 30, 2012*

Permit Application Number: *OHP000218*

IDP Number: *1DP00050*BP*

Facility Representative: *Tom Meyers*

Inspector(s): *Matt Walbridge*

COMPLIANCE

1. Date of last pretreatment inspection: *June 7, 2011*
2. Has the facility been in compliance with its permit limits since the last inspection? Y / N
If no, explain:
Based only on available data.
3. Is the facility in compliance with all other requirements?
Sampling procedures Y / N / NA
Reporting (late reporting, failure to report, etc) Y / N / NA
Compliance schedules Y / N / NA
Submitted BMR and 90 day compliance reports Y / N / NA
Any other requirements Y / N / NA
- If any of the above five answers is no, explain:
*Have not submitted a report for the period of July through December 2011.
Available monitoring data (but not reported) appeared to be compliant.*
4. Was the facility required to perform any actions as a result of the last inspection? Y / N
Explain any unresolved actions:
Still not documenting sample collection details (sample start/stop time, sampler pacing)

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *~45*
6. Shifts/Day: *1 (although a few people are on another shift but there is no paint line work on that shift.)*
7. Production Days/Year: *250*
(4-day work weeks with Fridays being for overtime. There has been more Friday work recently although the paint line is not normally run on Fridays)
8. Hours/shift: *10*
9. Any production changes since the last inspection? Y / N
If yes, explain:
10. General facility description and operations:
Job shop metal finisher including parts cleaning, deburring, tumbling, welding, painting, silk screening, pad painting and powder coat painting.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:
Aluminum is the main metal they process – some steel
12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:
The system consists of simply a settling tank (including one serving the tumbling operations). During cleanings, the pH of the process wastewater tank dumps is adjusted in the trench that is adjacent to the process line. Solids are retained behind the trench screen and removed.
See attached diagrams
14. Was a PTI issued for the treatment system? Y/N
15. Were there any modifications to the treatment system since the previous inspection? Y/N
If yes, was a PTI obtained? NA Y/N
PTI Number: _____ Date: _____
16. What is the treatment mode of operation? Batch / Continuous / Combination
If batch, list the frequency and duration:
pH adjustment of the process tanks dumps occurs approximately once every six months now with business being back up. Contents of the stage dumps are allowed to commingle to minimize need for pH adjustment. Stage 1 is now hauled off-site for disposal. The settling tanks receive the daily wastewater generated by the tumbling operations and the rinse tank overflows.
17. Who is responsible for operating the treatment system?
Tom Meyers
18. How often is the treatment system checked?
There are pH and conductivity meters on the process tanks that are checked regularly and daily titrations are conducted for maintenance of chemistry balance in the process tanks.
There is a lock-out on the sump pit to minimize the chance that the sump pit would discharge without the contents of the pit being checked.

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? Y / N
Explain:
A high water level alarm (audible/light) is in the trench pit adjacent to the phosphate line.
20. Is there an operations and maintenance manual? Y / N
There is an ISO-type document maintained and controlled by Mr. Meyers.
21. Is an inventory of critical spare parts maintained? NA Y / N
If yes, list:
(No parts associated with the system)
22. Are there any bypasses in the system? Y / N
If yes, describe the location:
- Have bypasses occurred since the last inspection? NA Y / N
- Was the POTW notified? NA Y / N
23. Are residuals or sludges generated? Y / N
Method of disposal:
Hauled off-site.
- Frequency and amount of disposal:
The settling tank serving the tumbler operations is cleaned out once per month into drums and the large underground settling tank is cleaned out once a year.
The process line tanks are cleaned out about once every six months (up from once a year now that business is back up) and contain some sediment. Cleanings are directed to the settling tank.
- Name of hauler/landfill/disposal facility:
Mid-West Environmental
- Is any sludge generated subject to RCRA regulations? Y / N
- If land applying sludge, is there a sludge management plan? NA Y / N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Alkaline Cleaner Tank		Not authorized for discharge	Hauled off-site	NA	NA
2. Alkaline Cleaning Rinse		~1,440 gpd with 900 gal dump every six months	~2,000 gpd with 900 gal dump every six months		
3. Iron Phosphate Tank		1,050 gal dump every six months	1,050 gal dump every six months		
4. Iron Phosphate Rinse		~1,440 gpd with 1,050 gal dump every six months	~2,000 gpd with 900 gal dump every six months		
5. Non-chrome Sealer Tank		750 gal dump every six months	750 gal dump every six months		
6. Sealer Rinse		~1,440 gpd to iron phosphate rinse with 100 gal dump every six months	~2,000 gpd to iron phosphate rinse with 100 gal dump every six months		
7. Tumbler		~800 gpd	~800 gpd		
8. ADF Washer		~ 35 gpd	~ 35 gpd		
Total Regulated Process Flow	<i>cleanout downstream from settling tank</i>	5,160 gpd	~7,000 gpd (1)	(1) Average flow for January 20011 through July 2011. They report total flow and a percentage that is dilute. Process flow can only be calculated (total minus total times ratio dilute) (2) Dilute flows from RO water system are reported to be between 25 and 40 % of total flow. That makes it ~2,500 to 7,000 gpd). Recent dilute ratios have been around 25%	
Noncontact Cooling					
Boiler Condensate					
Reverse Osmosis		1,840 gpd	(2)		
Softener Regeneration					
Softener Backwash					
Filter Backwash					
Compressor Condensate					
Storm water					
Total of Dilute Flows		2,000 gpd	~2,000 (2)		
Unregulated Flows		NA	NA		
Sanitary		Not present at sampling point	Not present at sampling point		
TOTAL FLOW	<i>cleanout downstream from settling tank</i>	7,000 gpd	~9,000 gpd(1)		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

NA

SELF MONITORING

26. Sample location(s) described in the facility's permit:

"Samples of the effluent from the settling tank shall be collected from the outside cleanout located at the southwest corner of [the] building."

27. Is the facility sampling at the location(s) described in the permit? Y / N
If no, describe the actual location:

Although the sample volume has indicated that the sampler may be collecting waste water when there is no active discharge.

28. Is the location(s) where the facility is sampling representative? Y / N
If no, indicate a representative location:

29. Is the flow measured or estimated? Measured / Estimated

If measured, how often is the meter calibrated?

The meters on tumbler/washer line, paint line and total incoming water line can't be calibrated.

If estimated, describe method of estimation:

Dilute flows are being reported simply as a percentage of total flow.

30. Is pH monitored continuously? Y / N
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? Y / N
If no, specify the sample collector:

Robertson Environmental LLC

32. Are appropriate sampling procedures followed? Y / N
Monitoring frequencies Y / N
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N
Flow proportioned samples *(they collect time-proportional samples)* Y / N
Proper preservation techniques *(the sample jars are pre-preserved)* Y / N
Sample holding times Y / N
Chain-of-custody forms *(the CoCs I observed show the client to be Robertson Environmental)* Y / N

33. Are samples analyzed in accordance with 40 CFR 136? Y / N

34. Laboratory conducting analyses:

Belmont Labs

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / N
If yes, identify organics:

Small amount of toluene (5 gallons) is used as for thinning paint. It is kept in a designated storage area.
36. Does the facility have a current toxic organic management plan(TOMP)? Y / N
If yes, is it being implemented?
- Y / N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y / N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y / N
If yes, does the facility have a written plan? NA Y / N
39. Identify any potential slug load or spill areas:

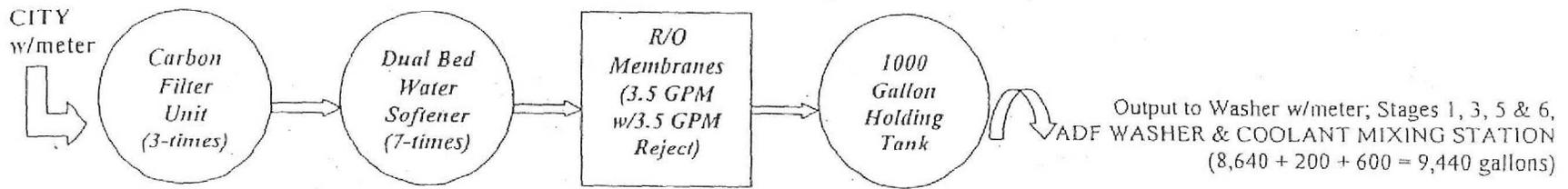
None identified during this inspection.

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

OBSERVATIONS

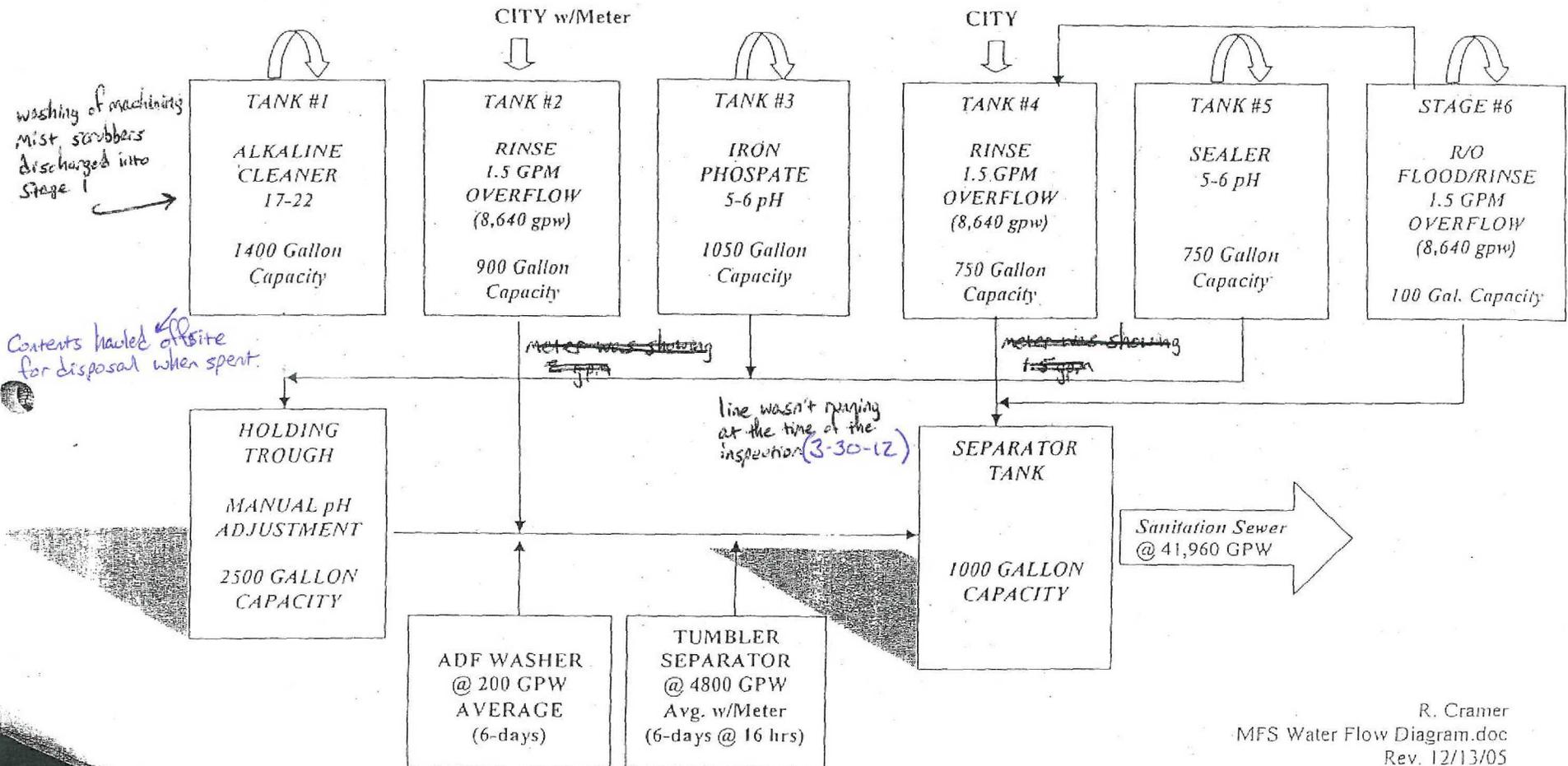
- *Chain of custody sheets continue to lack information for aliquot volume and frequency and the final composite sample volume.*
- *Chain of custody sheets and analytical reports indicate that the client is Richard Robertson when it should indicate that the sample and results are associated with Millat.*
- *It would be ideal if the analytical report was sent to Millat and they entered the data. This could help avoid the failure to report since the consultant appears to not be providing the results in a timely manner to allow for completion of DMRs.*

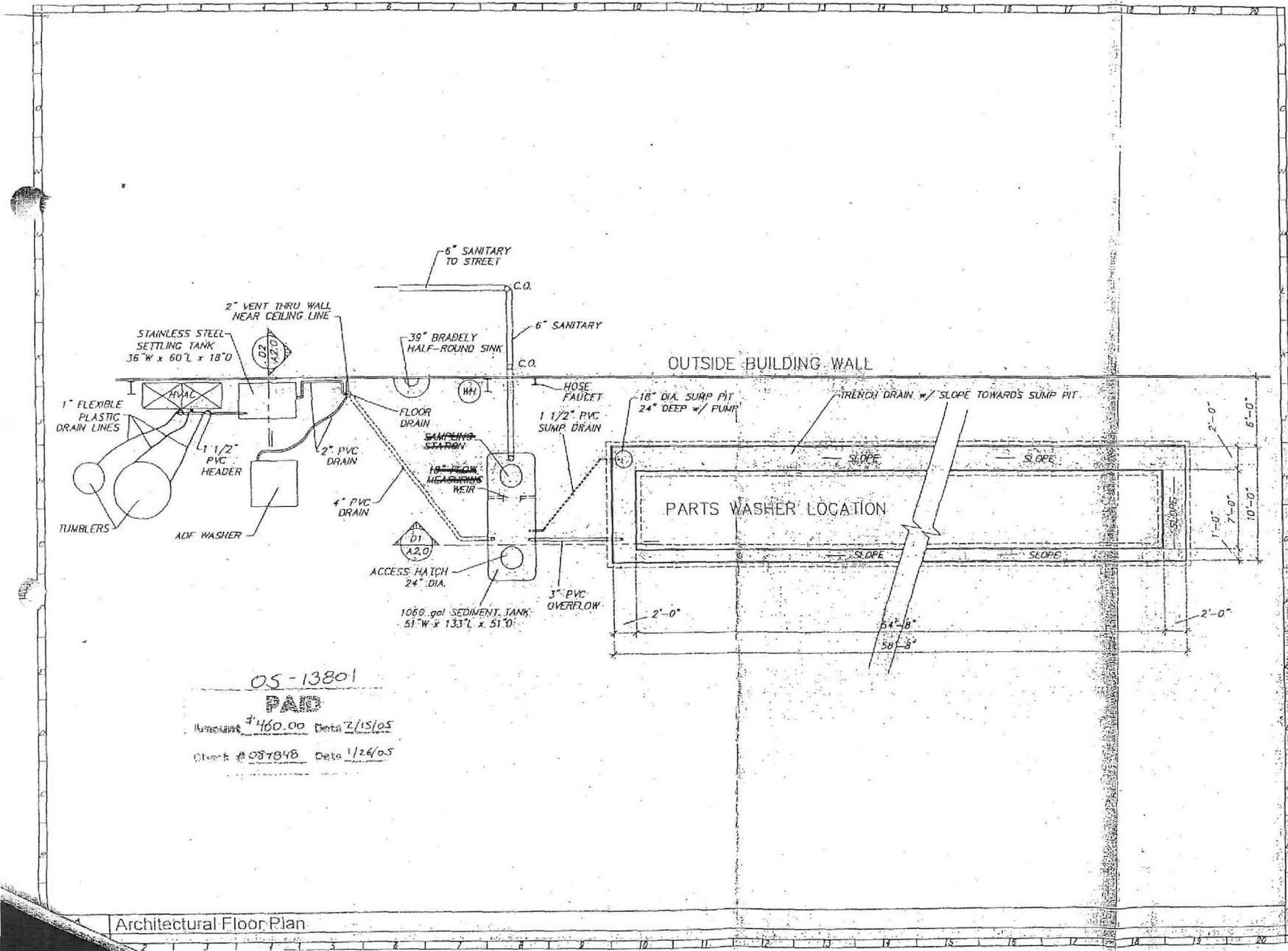


TO SEPARATOR: @ 600 GPW

@ 1000 GPW

9,440 GPW AVERAGE (Grand Total of Discharge Flows = 11,040)





05-13801
PAID
 Amount \$460.00 Date 2/15/05
 Check # 087848 Date 1/26/05

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Floor Plan
 Permit Documents

John J. Norton

Militec Industries
 Parts Washer, Trench and Septic Tank
 Center Point Drive
 Huber Heights
 State of Ohio

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