



**Environmental
Protection Agency**

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

Re: Putnam County
Unverferth Manufacturing Co., Inc.
Pretreatment

June 29, 2012

Mr. Greg Steinecker
Environmental & Safety Specialist
Unverferth Manufacturing Company, Inc.
P.O. Box 357
Kalida, Ohio 45853

Dear Mr. Steinecker:

On June 15, 2012, I conducted an inspection of the pretreatment system serving Unverferth Manufacturing Company, Inc., in Kalida. The inspection included a discussion of the operations and a tour of the facility to observe the wastewater generating processes.

The industrial wastewater that is sent to the pretreatment system is from the six stage metal pretreatment cleaning line. The cleaning line consists of three alkaline cleaner tanks, two rinse tanks and a zirconium bath tank. The rinse water tanks continuously overflow into a sump where the wastewater is pumped to the 7,500 gallon holding tank and fed gradually into the pretreatment system.

It was noted that the wash bay area has been constructed and will include an area for washing the press dyes. The wash water will go through a 1,000 gallon oil/water separator, then to a private sewer line that is tied into the Village of Kalida's sewer system. This discharge will be designated as 002 in the IDP renewal and will be sampled at the 102 manhole following the oil/water separator. The estimated flow for discharge is 300 gpd.

A review of the Discharge Monitoring Reports (DMRs) from April 2011 to April 2012 shows that the facility has had no permit limit violations. It was noted that the sampling requirements for the month of May were not completed.

Our completed inspection report is enclosed. If you have any questions, please call me at (419) 373-3053.

Sincerely,

Ryan Gierhart
Division of Surface Water

/jlm
Enclosure

pc: Jeff Schroeder
ec: Ryan Laake, DSW, CO
Tracking

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Unverferth Manufacturing Co, Inc.** Date of inspection: **6/15/2012**
OH Number: **OHP000233** IDP Number: **2DP00084*AP**
Facility Representative: **Greg Steinecker** Inspector(s): **Ryan Gierhart**

COMPLIANCE

- 1. Date of last pretreatment inspection: 04/28/2011
- 2. Has the facility been in compliance with its permit limits since the last inspection?
If no, explain: Y
- 3. Is the facility in compliance with all other requirements? Y
Sampling procedures Y
Reporting (late reporting, failure to report, etc) N
Compliance schedules NA
Submitted BMR and 90 day compliance reports NA
Any other requirements NA
- If any of the above five answers is no, explain:
Sampling was missed for May 2012.
- 4. Was the facility required to perform any actions as a result of the last inspection?
Explain any unresolved actions: N

FACILITY OPERATIONAL CHARACTERISTICS

- 5. Number of Employees: **340**
- 6. Shifts/Day: **2**
- 7. Production Days/Year: **260**
- 8. Hours/shift: **8**
- 9. Any production changes since the last inspection?
If yes, explain: N
- 10. General facility description and operations:
Manufacturer of agricultural equipment, cutting, shearing, welding, cleaning and powder coating.
- 11. Any change in materials used in production since the last inspection?
If yes, explain: N
- 12. Any expansion or production increase expected within the next year?
If yes, explain: N

WASTEWATER TREATMENT

- 13. Provide a schematic diagram and description of the wastewater treatment system:
- 14. Was a PTI issued for the treatment system? Y

15. Were there any modifications to the treatment system since the previous inspection? N
 If yes, was a PTI obtained? NA
 PTI Number: _____ Date: _____
16. What is the treatment mode of operation? Batch , Continuous / Combination
 If batch, list the frequency and duration: 10,000 to 15,000 gpd
17. Who is responsible for operating the treatment system?
Greg Steinecker supervises John Decker operates the systems.
18. How often is the treatment system checked?
The system is inspected and operated daily when plant is in operation.
19. Is there an alarm system for the system? Y
 Explain: **High level alarm on wastewater treatment tank. Telemetry system installed for alarms**
20. Is there an operations and maintenance manual? N
MRS has O & M manual Working on O & M manual for rest of system.
21. Is an inventory of critical spare parts maintained? Y
 If yes, list: **Pumps, pH meters, floats, Flow meter, MRS maintenance parts**
22. Are there any bypasses in the system? N
 If yes, describe the location:
 Have bypasses occurred since the last inspection? N/A
- Was the POTW notified? N/A

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated?

Y

Method of disposal:

United wastewater services

Frequency and amount of disposal:

With new MRS sludge has greatly decreased. Quality of current sludge is not adequate for belt filter press. Holding tanks are being pumped out 3 times per year and hauled by United wastewater services.

Name of hauler/landfill/disposal facility:

**United wastewater services is currently handling all of the sludge
Defiance County Landfill**

Is any sludge generated subject to RCRA regulations?

N

If land applying sludge, is there a sludge management plan?

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. Process waste water from treatment system			6,600		
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
Press Dye wash water			300		
Total Regulated Process Flow			6,600		
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condensate			4,320		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary Approx. 325 Employees			8,125		
TOTAL FLOW			19,045		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).
 All flow is discharged to POTW or are hauled off site (truck maintenance holding tanks).

SELF MONITORING

26. Sample location(s) described in the facility's permit: Y
 001 Taken after final stage of MRS prior to entering final discharge tank
 002 Sample will be taken at 102 manhole South east of prototype building
27. Is the facility sampling at the location(s) described in the permit? Y
 If no, describe the actual location:
28. Is the location(s) where the facility is sampling representative? Y
 If no, indicate a representative location:
29. Is the flow measured or estimated? Measured / Estimated
- If measured, how often is the meter calibrated?
 Using a Neptune nutating disc meter. Flow meter was proposed for spray wash line for the press dye waste water.
- If estimated, describe method of estimation:

- | | |
|----------------------------------------------------------------------------------------|---|
| 30. Is pH monitored continuously?
If yes, how often is the meter calibrated? | N |
| 31. Does the facility collect its own samples?
If no, specify the sample collector: | Y |
| 32. Are appropriate sampling procedures followed? | N |
| Monitoring frequencies | Y |
| Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) | N |
| Flow proportioned samples | Y |
| Proper preservation techniques | Y |
| Sample holding times | Y |
| Chain-of-custody forms | Y |
| 33. Are samples analyzed in accordance with 40 CFR 136? | Y |
| 34. Laboratory conducting analyses:
Alloway | |

TOXICS MANAGEMENT

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 35. Are any listed toxic organics used in the facility?
If yes, identify organics:
Xylene is used to hand wipe products for cleaning. | Y |
| 36. Does the facility have a current toxic organic management plan(TOMP)?
If yes, is it being implemented? | N/A
N/A |
| 37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: | N |
| 38. Does the facility need a spill prevention plan or slug discharge control plan?
If yes, does the facility have a written plan? | Y
Y. |
| 39. Identify any potential slug load or spill areas: | |

REQUIRED FOLLOW-UP ACTIONS

Operation and Maintenance manual for the treatment system is needed.