



Environmental
Protection Agency

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

July 2, 2012

RE: Pretreatment Compliance Inspection and
Notice of Violation

Mr. Eliot Baggs
Beach Manufacturing Company
P.O. Box 129
Donnelsville, OH 45319

Dear Mr. Baggs:

On June 20, 2012 I met with Mr. Don Fielder, Ms. Debbie Stultz and you to conduct a pretreatment compliance inspection. A review of available monitoring reports since my previous inspection revealed no reported violations of your permit. Results from monitoring for the current period not yet reported (report due July 20th), revealed a pH violation of 4.81 on January 19, 2012 and copper violation of 6,160 ug/l on May 24, 2012. You plan to sample the discharge one more time at the end of June when stages 4 and 5 are discharged.

Neither of these violations was reported to me as required by Part III, Item 3.H of your permit.

Addition of Zinc Phosphating

1. Most notable from the inspection was your announcement that during the July shutdown you will begin using zinc phosphate in place of the hexafluorozirconic acid solution to perform conversion coating prior to painting. Part III, Item 11 of your permit requires you to notify the Director of Ohio EPA of significant changes to your operations or discharge. These notices are expected to be made at least 180 days prior to the proposed change; your two-week notice does not comply with this requirement.

Without any treatment, I am very doubtful of your ability to comply with the National Categorical Pretreatment Standards for Metal Finishing as reflected in your current permit. Because Beach Manufacturing did not provide the required notification and is planning to proceed with this switch to zinc phosphating despite my expressed concern about your ability to comply; and since there isn't a treatment system and violations would be expected to continue, early violations will be subject to early enforcement.

2. To address the issue of your ability to comply with the discharge limits after you make the switch to zinc phosphating, you have proposed to conduct special monitoring of the zinc phosphate rinse tank (what will be stage 4). After four days of normal operations, you will collect a sample from the tank and conduct a 24-hour composite sampling event at the effluent monitoring station in your permit. The results of this monitoring will be forwarded to me via email as soon as they are available. The composite sample result will also be reported on your discharge monitoring report (via e-DMR).

Additionally, you indicated that you would perform monitoring twice per month (at approximately 2-week intervals) for two months with the results reported on your DMR. Any violations from this special monitoring will require notification to this office in accordance with Part III, Item 3.H of your permit

3. Without a treatment system, the discharge of zinc phosphate solution (in stage 3) to the sanitary sewer is unacceptable and must be managed through off-site disposal.

Total Toxic Organics Monitoring

For the reporting period of July through December 2011, the reported values for TTOs were identical to the copper results. It is necessary for you to amend the DMR for that period and either report results from TTO monitoring or submit the alternate TTO certification statement. To certify, you would enter the reporting code "AH" and then include the certification statement in the comment block associated with that reporting code. I provided you the certification statement via email for your use.

Composite Sample Collection

The sampling details recorded by Advanced Analytics continue to indicate that samples are not representative of facility operations. Specifically, the automatic composite sampler is set to collect 50 milliliters every 20 minutes and attempts to pull aliquots during the entire 24-hour sampling period. Beach Manufacturing operates the paint prep line for approximately eight hours a day.

However, records show that the composite sample volumes reflect aliquots being successfully collected over the entire monitoring period, which should not be possible since there shouldn't be any wastewater present during the 16 hours per day the facility is not operating. The following is a summary of recent sampling records:

Date of Monitoring (2012)	Composite Sample Volume (ml)	Discharge Volume (gal)
January 19	9,000	556
March 14	3,450	501
May 23	5,800	605

Presuming wastewater is only present when the facility is operating; the sampler setting should result in a composite sample volume of only 1,200 ml for an 8-hour work day ($8 \times 60 \div 20 \times 50 = 1,200$ ml). Even if there was wastewater for the sampler to collect for the full 24-hour period, the maximum composite sample volume would be 3,600 ml ($24 \times 60 \div 20 \times 50 = 3,600$ ml).

Beach Manufacturing must investigate and resolve this long-standing issue and address its obligation to collect samples that are representative of its operations as required by Part III, Item 4 of its permit. The presence of flow at the monitoring location when manufacturing operations are inactive is unacceptable when not performing flow-proportional sampling. Also, locating the sampler intake at a point where water pools is unacceptable because it allows the sampler to successfully pull aliquots even when there is no active discharge.

Mr. Eliot Baggs
July 2, 2012
Page 3

To address this long-standing deficiency, you will need to conduct a thorough evaluation of your sampling methods and location and outline how you will ensure future sampling will be representative of your facility's operations. Failure to properly address and resolve this issue may result in you being required to install a flow meter on the discharge line and begin performing flow-proportional sampling. Please provide a summary of the findings from your investigation by August 3rd.

Please provide a written response by July 16th indicating your intentions to address the issues I have presented in this letter. If you have any questions concerning this letter or the inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

MW/tf

Enclosure

ec: Debbie Stultz, Beach Manufacturing (via e-mail)

cc: Ryan Laake, Ohio EPA / Central Office / DSW
Joe Sampson, Village of Saint Paris



Environmental
Protection Agency

Southwest District Office

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER 1DP00001*DP	PERMIT APPLICATION NUMBER OHP000011	DATE CONDUCTED June 20, 2012
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2
		TIME IN 0930
		TIME OUT 1140

GENERAL INFORMATION	
NAME AND LOCATION OF FACILITY Beach Manufacturing Company 500 S. Springfield Street St. Paris, OH 43072	POTW RECEIVING DISCHARGE Village of St. Paris WWTP
MAILING ADDRESS OF FACILITY Beach Manufacturing Company 500 S. Springfield Street St. Paris, OH 43072	Mr. Eliot Baggs Beach Manufacturing Company PO Box 129 Donnelsville, OH 45319-0129
CONTACT (NAME/TITLE/PHONE/E-MAIL) Ms. Debbie Stultz / Plant Manager / (937) 663-5531 / debbiestultz@beachmfgco.com	

FACILITY EVALUATION (See Inspection letter for more complete description)	
(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)	
U Sampling Procedures	NA Compliance schedule requirements
M Reporting	U Notification
M Compliance with effluent limits	U Other – Notification of change in process chemicals

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 7-2-12
Signature of Reviewer Matt G. Burt	Ohio EPA / Southwest District Office / (937) 285-6034	Date 7/3/12

INDUSTRIAL USER INSPECTION CHECKLIST

Facility **Beach Manufacturing Company**

Date of inspection: **June 20, 2012**

Permit Application Number: **OHP000011**

IDP Number: **1DP00001*DP**

Facility Representative: **Ms. Debbie Stultz
Mr. Eliot Baggs**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **June 21, 2011**
2. Has the facility been in compliance with its permit limits since the last inspection? Y/N
If no, explain:

A review of their report for the period of July through December 2011 revealed no reported limit violations. A review of available analytical data for the current period (report due July 20th) revealed a pH violation (4.81 on 1-19-12) and a copper violation (6,160 ug/l on 5-24-12).

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:

- **Failure to notify within 24 hours of a violation**
- **The TTO values for all of 2011 are the same as the reported copper values.**
- **They did not perform TTO monitoring yet they did not submit the alternate TTO certification.**

4. Was the facility required to perform any actions as a result of the last inspection? Y/N
Explain any unresolved actions:

They failed to conduct special monitoring as requested in my inspection letter.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **13**
6. Shifts/Day: **1**
7. Production Days/Year week : **4 (sometimes 5)**
(One week off at the beginning of July and approximately a week off in December)
8. Hours/shift: **8**
9. Any production changes since the last inspection? Y/N
If yes, explain:

(Mostly truck components from hot and cold-rolled steel)

10. General facility description and operations:

Job Shop parts washing and painting operation (powder coat).

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:

Still mostly cold-rolled steel

12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

Planning to switch to zinc phosphating following July shut-down.

WASTEWATER TREATMENT

13. Provide a schematic diagram description of the wastewater treatment system:

See Attached Diagram

14. Was a PTI issued for the treatment system? **N.A.** Y/N

15. Were there any modifications to the treatment system since the previous inspection? **N.A.** Y/N

If yes, was a PTI obtained? **N.A.** Y/N

PTI Number:

Date:

16. What is the treatment mode of operation? **N.A. (No treatment)** Batch / Continuous / Combination

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

Dee Harvey

18. How often is the treatment system checked?

***Stages are checked three times throughout the day.
(Flow rates, spray patterns, conductivity, pH, chemical titrations)***

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? Y / N
Explain:

High level alarms on all tanks except rinse tank.

20. Is there an operations and maintenance manual? Y / N

There is a 'Line Check Sheet' for the production process line that is kept at the line.

21. Is an inventory of critical spare parts maintained? N.A. Y / N
If yes, list:

22. Are there any bypasses in the system? N.A. Y / N
If yes, describe the location:

Have bypasses occurred since the last inspection? N.A. Y / N

Was the POTW notified? N.A. Y / N

23. Are residuals or sludges generated? Y / N

Alkaline Cleaner tank (Parco 305) is cleaned once per year. Draining includes power washing the inside of the tank. All wastewater, cleaning water and solids are drained to the sanitary sewer. They say there isn't a significant amount of solids.

Method of disposal:

Sanitary sewer

Frequency and amount of disposal:

Hexafluorozirconic acid solution tank (new as of Fall 2010) is drained approximately every 6 months. It was just dumped at the beginning of June 2011. Permit requires monitoring when tank is dumped but I'm not sure if this happened.

Alkaline cleaner tank (~2,350 gallons) is drained to sewer approximately once per six months (because of new cleaner's higher expense, they are looking to run longer between dumps).

Name of hauler/landfill/disposal facility:

Heritage Crystal Clean does the cleaning

Is any sludge generated subject to RCRA regulations? N.A. Y / N

If land applying sludge, is there a sludge management plan? N.A. 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 Wash Tank		Not Limited	2,350 gal 1/6 mo.	N.A.	N.A.
2. Tap Water Rinse (metered at ~1 gpm)			~500 gpd and 1,220 gal dump 1/mo.	N.A.	N.A.
3. RO water Rinse (~0.2 gpm)			~100 gpd and 2,440 gal dump 1/mo.	N.A.	N.A.
4. Hexafluorozirconic Acid Tank			1,100 gal dump every 6 months	N.A.	N.A.
5. RO water Rinse (metered at ~1 gpm)			~500 gpd and 1,000 gal dump every two weeks.	N.A.	N.A.
Total Regulated Process Flow	Clean out located in the alley	Not limited	~1,100 ⁽¹⁾	<p>(1) Reported flow, which is taken from the meter that measures total water usage, averages ~720 gpd so regulated process flow should be about 30 % less because of the RO reject rate. This puts process flow at about 500 gpd. The overflow rates and hours of operation should put their discharge at ~1,000 gpd.</p> <p>(2) Only process wastewater is present at the sampling point. Sanitary, RO reject and Softener regeneration are discharged via a separate line.</p>	
Noncontact Cooling	-	-	-		
Boiler Condensate	-	-	-		
Reverse Osmosis	-	-	ND ⁽²⁾		
Demineralizer Regeneration	-	-	-		
Softener Regeneration	-	-	ND ⁽²⁾		
Filter Backwash	-	-	-		
Compressor Condensate	-	-	-		
Storm water	-	-	-		
Total of Dilute Flows	N.A.	N.A.	ND ⁽²⁾		
Unregulated Flows	N.A.	-	-		
Sanitary	N.A.	N.A. ⁽¹⁾	N.A. ⁽²⁾		
TOTAL FLOW	N.A.	N.A.	~1,100 ⁽¹⁾		

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

SELF MONITORING

26. Sample location(s) described in the facility's permit:
"Samples shall be collected from the cleanout located outside of the south wall of the main building prior to the effluent mixing with sanitary flow."
27. Is the facility sampling at the location(s) described in the permit? Y / ~~N~~
If no, describe the actual location:
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~~
Main water meter is said to be used which represents water sent to the deionization and softener units, so process waste water should be around 500 gpd. Readings are taken at the beginning and end of sampling events.

If measured, how often is the meter calibrated?
Flow meters have been installed on the feed lines to stages 2, 3 and 5.

If estimated, describe method of estimation:
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:
'Cindy' of Advanced Analytics
32. Are appropriate sampling procedures followed?
Monitoring frequencies Y / ~~N~~
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / ~~N~~
Flow proportioned samples (***flow rates are constant so time-proportioned samples should be adequate***) ~~Y~~ / **N**
Proper preservation techniques Y / ~~N~~
Sample holding times Y / ~~N~~
Chain-of-custody forms Y / ~~N~~
33. Are samples analyzed in accordance with 40 CFR 136? Y / ~~N~~
34. Laboratory conducting analyses: ***Advanced Analytics***

TOXICS MANAGEMENT

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

Touch-up primer & paint and xylene-based solvent.

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? N.A. Y / N

39. Identify any potential slug load or spill areas:

None

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

OBSERVATIONS

- ***Sample period is 24-hours. The automatic composite sampler is set to collect 50 milliliters every 20 minutes and continues to attempt to pull aliquots. At the end of the 8-hour work day, all water to the production line is said to be shut off with a solenoid valve.***

I continue to note that recorded composite sample volumes indicates aliquots were successfully collected over the entire monitoring period, which should not be possible since there shouldn't be any waste water present during the 16 hours per day the facility is not operating.

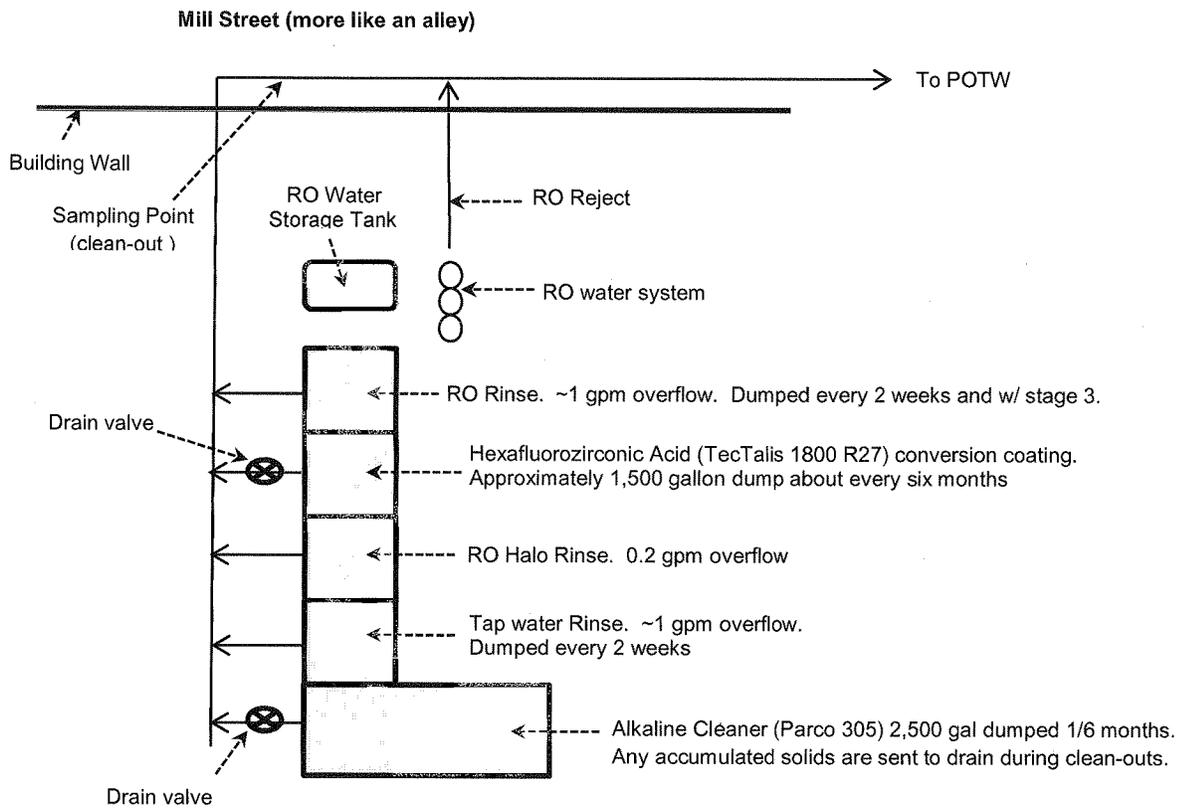
<i>Date of Monitoring (2012)</i>	<i>Composite Sample Volume (ml)</i>	<i>Discharge Volume (gal)</i>
<i>January 19</i>	<i>9,000</i>	<i>556</i>
<i>March 14</i>	<i>3,450</i>	<i>501</i>
<i>May 23</i>	<i>5,800</i>	<i>605</i>

Presuming waste water is only present when the facility is operating, the sampler setting should result in a composite sample volume of only 1,200 ml for an 8-hour work day ($8 \times 60 \div 20 \times 50 = 1,200$ ml).

Even if there was waste water for the sampler to collect for the full 24-hour period, the maximum composite sample volume would be 3,600 ml ($24 \times 60 \div 20 \times 50 = 3,600$ ml).

This issue must be addressed.

- ***Flows are based on meter readings at the beginning and end of sampling events but there is likely significant evaporation and diversion through the RO system (reject is discharged separately).***
- ***They mentioned that they might be installing an air sparge and centrifuge on the zinc phosphate tank to remove solids.***
- ***I am concerned about their ability to comply with permit limits if the final batch of hexafluorozirconic acid solution in stage 4 is discharged to the sanitary sewer.***
- ***They are planning to rehabilitate the currently unused oil skimmer on the alkaline cleaner tank.***



Below is my understanding of the new paint prep line configuration

