



Environmental Protection Agency

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

July 16, 2012

RE: NPDES Compliance Evaluation Inspection Notice of Violation

Mr. Tim W. McDaniel
Navistar, Inc.
6125 Urbana Road
Springfield, OH 45502

Dear Mr. McDaniel:

On June 27th, I met with Lisa Silva and Mike Giffen to conduct a Compliance Evaluation Inspection (CEI) of your facility. Mr. Giffen is with Crown Solutions who took over contract operations on June 11th.

A review of discharge monitoring reports since the previous inspection revealed the following reported violations:

Table with 4 columns: Parameter, Date, Limit, Reported Value. Rows include TSS (January 2012, January 1-7, 2012), CBOD5 (April 1-7, 2012), and Zinc (March 2012, March 15, 2012) under Outfall 001 and Outfall 601.

Since you have previously provided written explanations for these violations, no further response is necessary.

Cloudy Plume in Receiving Stream

On July 9th, you provided a written notification of conditions in the receiving water on July 5th that were similar to what occurred in 2010 when the discharge reacted with the stream to cause a cloudy white plume to form. You attributed the root cause to be the wastewater from the boilout of Stage 5 (zinc phosphate tank).

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As a follow-up to this notification, you indicated that ferric chloride and anionic polymer were added to the sanitary side as treatment, but that batch treatment of the industrial wastewater segregated into tank T2A using the same ferric/polymer addition was ineffective.

You then transferred the wastewater that was the cause of the cloudiness into frac tanks and have directed the operators to restrict the flow of this wastewater into the industrial wastewater treatment system to about 5 gpm.

In 2010, the cause of the cloudiness was attributed to an excessive dosage of calcium chloride. The cloudiness this time was apparently caused by an excessive volume of boilout wastewater being processed; presumably treated with the normal dosage of calcium chloride. It seems to me that your use of calcium chloride can significantly impact the quality of the wastewater both in regards to the biological system and the final effluent and that its use, along with the processing of wastewater treated with it needs to be controlled very carefully.

I hope that continued treatment of boilout wastewater will not cause your discharge to again violate Part III.2.C of your NPDES permit by causing the stream to become discolored, nor violate any other requirement of the permit. In the future, if the effluent causes a cloudy plume to form in the stream, please notify our office immediately (within 24 hours of discovery).

Future Boilouts

You indicated that the Stages 1 & 2 were not included in this boilout event and that these tanks would instead be cleaned over the Labor Day holiday period. Please let me know if there are any changes to this plan.

Nickel at Outfall 001

A review of your monitoring data revealed that nickel in the final effluent (and to a degree at outfall 601) has increased significantly since about March 2012. I would be interested in any explanation you may have for this change.

Sanitary Clarifier Damage

At the time of the inspection, the north clarifier was out of service and was being repaired after the skimmer arm was bent from being caught on a water hose that had fallen into the clarifier. In making the repair, it was revealed that a center stilling well support bracket was severely corroded and in need of repair. Following the repair to the north clarifier, the south clarifier was to be drained and inspected for the same corrosion. Please let me know of any noteworthy findings from this event.

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Industrial Waste Clarifier

Water in the industrial clarifier was dark gray and otherwise looked very unusual with a blocky film on the surface. Also, the flights were not moving and the drive motor had to be turned on. Movement of the flights appeared jerky despite their slow speed. As movement continued, the wooden flights and metal work that surfaced were black as compared to the dry natural wood color of the flights that were already above the surface.

I was told that the industrial clarifier was recently off line and that the dark color of the water is attributable to the E-coat solvent acid wastewater being in Tank AER-6 for a very long time. This long residence time allowed the solvent acid wastewater to react with the metal in tank AER-6 and impart a dark color to the wastewater and that this color persists through transfer to tank T2-B and treatment through the industrial waste system. I observed no color in the final effluent.

Composite Sampling Station

The refrigerators for the composite samples need to be equipped with thermometers that are accurate to $\pm 1^{\circ}\text{C}$. Also, a temperature log book needs to be maintained at each location to demonstrate whether the refrigerator maintains the composite sample to less than 6°C . Temperature logs would only be necessary on days of sample collection. The log book would also be where the correction factor, based on at least yearly checks against an NIST-traceable thermometer, is recorded. Finally, the probes were in poor condition and need to be cleaned of what appeared to be scale. Probes should be suspended in a water solution, and you may want to consider using a VOC bottle to accomplish this. Please address this requirement by August 3rd.

Composite Sampling Equipment

We discussed the value of cleaning sampling equipment to minimize negative impacts to samples sent for analysis. You previously attributed a suspended solids violation to dirty hoses. It is my opinion that your composite sample jugs are quite worn and could stand to be replaced. Sampler tubing should also be cleaned and replaced regularly. I encourage you to develop written procedures for cleaning these items on a regular cleaning schedule.

Daily Log Book

Finally, I found the daily log book to be very comprehensive and well-utilized. Thank you for your effort to document the conditions and activities associated with the operation of your wastewater treatment systems.

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Please provide a written response to this inspection letter by August 6, 2012, addressing the findings I have presented. If you have any questions concerning this letter or the attached inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

MW/tf

Enclosures

cc: Lisa Silva, Navistar
Mike Giffen, Crown Solutions



Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0009954	11N00022*JD	6-27-12	Recon	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Navistar, Inc. 6125 Urbana Road Springfield, OH 44501	0930	8-1-07 <i>(modified 3-1-11)</i>
	Exit Time 1430	Permit Expiration Date 1-31-12
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Lisa Silva – Navistar / Environmental Engineering Supervisor Mike Giffen – Crown Solutions (contract operator)		(937) 390-4026 (office) 605-0835 (cell) (937) 390-4024
Name, Address and Title of Responsible Official		Phone Number
Tim McDaniel - Environmental Health and Safety Manager Navistar, Inc. 6125 Urbana Road Springfield, OH 44501		(937) 390-4024

Section C: Areas Evaluated During Inspection – See Inspection Letter For More Information					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
N	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	Compliance Schedule
M	Operations & Maintenance	S	Effluent/Receiving Waters	M	Self-Monitoring Program
-	Facility Site Review	N	Sludge Storage/Disposal	N	Collection System

Section D: Summary of Findings (Attach additional sheets if necessary)

- **Crown Solutions took over waste water treatment operations June 11th.**
- **The equalization basin was completely full in preparation for treatment of boilout wastewaters during shutdown (beginning June 28th).**
- **There was slight turbidity in the stream in the area of the outfall although the effluent appeared clear. Turbidity could be the result of turbulence at the point of discharge to the stream.**
- **Lab equipment was clean ^{and} orderly. pH, DO and Cl analysis all done in-house. Other parameters continue to be analyzed at a contract lab.**
- **A zinc reading of 1,500 ug/l in tank T2-B was recorded in the log book. I couldn't find another zinc measurement elsewhere in the book so it is unknown how the measurement compares to the zinc concentration at other times.**
- **The pH meters in the industrial waste treatment system are said to be calibrated once per week (on Mondays or whenever treatment starts) and are checked with a buffer solution daily. Meters were reading 2.65, 9.45 and 9.57 in the respective stages.**
- **North clarifier was down for repairs to skimmer arm that was bent by an unattended water hose that fell in and caught in the arm. They are looking into why the torque limiter didn't stop the drive motor. During the repair, it was revealed that a stilling well baffle connection point was severely corroded and close to failure. It was repaired and the south clarifier was go be inspected for the same condition.**
- **The flights in the industrial clarifier were not operating (although the flights in the sludge collector pit were operating). The water was dark grey and otherwise looked very unusual.**

Inspector		Reviewer	
	7-16-12		
Matt Walbridge Division of Surface Water Southwest District Office	Date	Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office	Date