



**Environmental  
Protection Agency**

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

August 16, 2012

RE: KEN FORGING JEFFERSON PLANT  
OHIO EPA PERMIT 3IS00121  
JEFFERSON TWP., ASHTABULA COUNTY  
COMPLIANCE INSPECTION EVALUATION

Mr. Kenneth A. Powell, Maintenance Supervisor  
Ken Forging Inc.  
1049 Griggs Road  
Jefferson, OH 44047

Dear Mr. Powell:

On August 15, 2012, a site inspection was conducted at the above referenced facility at 1049 Griggs Road, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office with you representing Ken Forging during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on August 5, 2011 and November 1, 2011.

There are no floor drains within the manufacturing building. Industrial process wastewater is limited to waters collected from outside sealed dumpsters discharged to storm water ditches at the perimeter of the facility. Wastewater flows to the package plant is limited to domestic sewage from employee restrooms.

**Observations**

The following observations were made during the inspection:

1. The influent pumps and alarms were cycled and found in operating condition.
2. The aeration tank contents had a chocolate brown colored sludge that is well aerated with no foaming. Blowers and alarms were cycled and found in operating condition. The plant was observed in good working order.
3. The log book, copy of the contract, copy of the NPDES permit, and O & M manual for the plant are maintained at the facility and were available for inspection. The information was found compliance with OAC 3745-7-09. Dustin Lewis and Roger Osborne of Lewis Wastewater Management were the operators of record (ORC) through December 10, 2011, and Steve Howe of Ake Environmental assumed these duties as of December 15, 2011. In addition to the official ORCs, Ken Powell, Carl May, and George Burgard (all Class A operators) also manage the plant. Ken Forging personnel and the ORC perform routine operations at the WWTP monitors the facility, and performs the sampling. The ORC submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application on behalf of Ken Forging. Plant personnel possessing a Class A operator's license perform daily operations at the WWTP.

4. The influent pump station and equalization tank pumps and alarms were cycled and found in operating condition.
5. The blowers and alarms were cycled and found in operating condition. From examination of the aeration tank, there appears to be an air line leak resulting in uneven air distribution across the tank. A slight septic odor was observed. The contents of the tank were noted as a dark brown. The return sludge lines were noted as operational.
6. Clarifiers were observed in good working order. The clarifier was noted as somewhat turbid, with objects more than a few inches deeper than the surface could not be seen. The skimmer and return sludge lines were observed in operational condition. The contents of the clarifier were dark. Sludge is removed from the system quarterly.
7. The surface sand filter dosing pumps and alarms were cycled and found in operating condition.
8. The wastewater entering the sand filters was observed as clear. The sand filters were raked and free of any debris, and had sidewall joints sealed. Water freely percolated through the filters.
9. The chlorine contact tank was found to be clear and stocked with chemicals and aerating the wastewater prior to dechlorination.
10. The dechlorination system was found operable and stocked with appropriate chemicals.
11. The final discharge to the pond was found to be discharging clear. The pond was noted as full of duckweed, with dead fish noted in it. Fish were found clustered at the final outfall. The final outfall was observed as clear and of acceptable visual quality.
12. No evidence of discharges was noted from the exterior double walled tanks or from the roll-off box storage area.
13. Storm water discharge point to perimeter ditches at the facility was observed as clear.

**NPDES Permit Compliance Review**

A review of the eDMRs received by Ohio EPA for the period July 1, 2011 through July 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

**Effluent Limit Violations**

The following effluent limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	8.9	12/1/2011
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	24.25	3/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	24.25	3/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.028	.10096	3/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	7D Qty	0.043	.10096	3/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	8.6	6/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.009	.02767	6/1/2012

001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	8.6	6/8/2012
001	00610	Nitrogen, Ammonia (NH3-N)	7D Qty	0.014	.02767	6/8/2012

Ohio EPA notes that the violations have placed Ken Forging in **significant noncompliance** for nitrogen ammonia. A written explanation as to why these exceedence events occurred must be provided, along with measures to ensure that they are not repeated. A written response to these events must be provided.

Frequency Violations

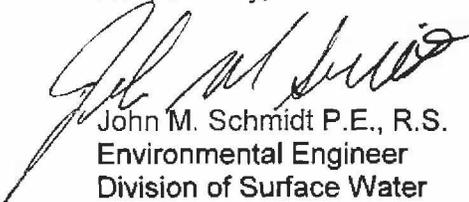
Although no specific reporting frequency violations were noted, Ohio EPA does note that the improper "A" code is being reported in the eDMR for weekends and holidays. The eDMR is reporting the code "AH" and providing an explanation when the code "AN" should be reported for weekends and holidays when the plant is not normally staffed for daily readings of flow rate, odor, color, and turbidity. Please revise the eDMR reports accordingly.

Compliance Schedule

Ohio EPA notes that the current NPDES permit does not contain a compliance schedule.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

cc: Steve Howe, Ake Environmental

File: Industrial/Ken Forging Inc./pc