



**Environmental
Protection Agency**

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

Re: Erie County
Akzo Nobel Paints
Indirect Discharge Permit
NPDES Permit

March 7, 2012

Mr. Greg Seavers
HSE&S Manager
Akzo Nobel Paints
300 Sprowl Road
Huron, Ohio 44839

Dear Mr. Seavers:

On February 28, 2012, an inspection was made prior to beginning the renewal of your Indirect Discharge Permit (IDP), which expires on March 31, 2012. Mr. Chris McCarron, Erie County Wastewater Superintendent, also attended since your discharge is tributary to the Huron Basin WWTP. Storm water outfalls monitored under your National Pollutant Discharge Elimination System (NPDES) permit were also inspected. This facility manufactures latex paint, as well as oil based paint and industrial resins; however, all oil base/resin waste water is hauled off site, with the exception of BTEX waste water from two activated carbon units. Production is steadily increasing due to continued company consolidation to this plant and an improving economy. My comments and recommendations are as follows:

Indirect Discharge Permit – Mr. McCarron raised some issues that have affected operations at the WWTP and the receiving pump station at Sprowl Road. The first dealt with pass through of surfactants, which twice resulted in foaming at the Huron River outfall, and the second with slug loads of concentrated inert solids that discolored settling tanks at the POTW. The events were linked to latex paint production tank washings sending slug loads to the industrial waste treatment plant, prior to being sent on to the POTW.

Part II, Item 3, of your IDP requires you to notify the POTW of any slug loading as well as providing a written report within five business days of the incident including steps taken to eliminate and prevent reoccurrences of the slug loading. It appears this permit condition is not being complied with, and must be if future incidents occur. Please refer to your permit for reporting details. I am also asking you to prepare a slug discharge control plan, and previously emailed you a U.S. EPA guidance document to assist in its preparation. Please notify me within 14 days indicating when the plan will be prepared and submitted.

Mr. Greg Seavers
March 7, 2012
Page Two

Mr. McCarron also stated that the Sprowl Road pump station is requiring more frequent maintenance due to premature corrosion of the impeller. Your IDP currently has a 6.0 minimum pH limit on your discharge. Erie County has requested the minimum pH be raised to 7.0 in the upcoming IDP renewal. You indicated that since pH is adjusted prior to discharging, you have no opposition to this new limit.

Discharge monitoring reports are being reported in our electronic reporting system (eDMR) in a timely manner and indicate full compliance. The semiannual Total Toxic Organics certification monitoring is also being conducted and indicates levels "below detectable limits".

We received your IDP renewal application; however, the required sampling report form was omitted and you stated that it would be submitted as soon as possible. I also informed Erie County that an acceptance letter is required from them indicating continued acceptance of the discharge along with any comments.

You will be receiving a "draft" copy of the renewal permit in the near future for your review. Please review it carefully, as you will have a 30-day period in which to comment. Once issued final, it will remain effective for another five year period.

NPDES Permit – This permit regulates storm water leaving the property. All ditches and both outfalls were running clear with no visible oil sheen. We also viewed two containment areas, a newer one, west of the warehouse, with a 10' high weir wall and electro-hydraulically actuated valve that can be closed in event of a spill.

My IDP inspection report is enclosed. If you have any questions, or any of the above is in error, please call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us

Sincerely,



Richard A. Zuzik, MSE
Division of Surface Water

/jlm

Enclosure

pc: Chris McCarron, Erie County WWTP Superintendent

ec: Inspection Tracking

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: AKzo Nobel Paints

Date of inspection: 2-28-12

OH Number: P000064

IDP Number: 2DP00027*CP

Facility Representative: Greg Seavers

Inspector(s): Rick Zuzik

COMPLIANCE

1. Date of last pretreatment inspection: Feb 4, 2009
2. Has the facility been in compliance with its permit limits since the last inspection?
If no, explain: (Y) N
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 POTW of slug discharges
4. Was the facility required to perform any actions as a result of the last inspection?
Explain any unresolved actions: Y (N)

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 375
6. Shifts/Day: 3
7. Production Days/Year: 300
8. Hours/shift: 8
9. Any production changes since the last inspection?
If yes, explain: (Y) N
10% increase
10. General facility description and operations:
Manufacture following products:
- Water base latex paint
- Water base tinting colorants
- Synthetic Resins
- Oil Base paint

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection?

Y (N)

If yes, explain:

Operations continue to trend to lesser VOC content products

12. Any expansion or production increase expected within the next year?

(Y) N

If yes, explain:

slow increase

WASTEWATER TREATMENT

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

Polymer Floc Tank → Specialty Coating Settling Tank^{Latex} → Settling tank
 Supernatant → Flow EQ Tank → pH adjustment → Lift Station to Huron Basin POTW
 Polymer Floc Tank → Settling Tanks → Sludge Filter Press → Barnes Nursery

Only 1/2 S.C. tanks used

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?

Y (N)

PTI Number:

Date:

16. What is the treatment mode of operation?

(Batch) Continuous / Combination

If batch, list the frequency and duration:

Continuous pH adjustment

17. Who is responsible for operating the treatment system?

Greg Seavers

18. How often is the treatment system checked?

Daily

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system?

Explain:

EQ Tank: - Alarms for high & low pH
- low water level
- high & low temp.

(Y)N

20. Is there an operations and maintenance manual?

(Y)N

21. Is an inventory of critical spare parts maintained?

If yes, list:

All mechanical components can be repaired w/in 24 hrs

(Y)N

- Backup generator on-site

- Redundant back up pH probe (one new one)

22. Are there any bypasses in the system?

If yes, describe the location:

(Y)N

Have bypasses occurred since the last inspection?

Y(N)

Was the POTW notified?

N/A Y(N)

23. Are residuals or sludges generated?

(Y)N

Method of disposal:

Transported to Barnes Nursery
for bulking agent

- Erie Co. landfill for back-up

Frequency and amount of disposal:

3-4 x/month from 20 yard lined storage box

20-30 yds/month, approx. 600,000 lbs/yr

Name of hauler/landfill/disposal facility:

BFI -> Barnes Nursery

Is any sludge generated subject to RCRA regulations?

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. Latex Paint WW	Outfall Bldg		2500		
2. Latex Specialty Coating WW	Outfall Bldg		200		
3. Dramatone WW	Outfall Bldg		250		
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow			2950		
Noncontact Cooling			24,700		
Blowdown					
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary			3100		
TOTAL FLOW			27,800		

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

Resin Plant WW:
 Hazardous - Onyx for fuel blending
 Non-Hazardous - Evaporated on-site
 Stormwater - NPDES Permit

SELF MONITORING

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

Yes

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

(Y) / N

Outfall Bldg

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

(Y) / N

29. Is the flow measured or estimated?

(Measured) / Estimated

If measured, how often is the meter calibrated?

1/ year

If estimated, describe method of estimation:

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

1/month (in-house)
1/ Qtr (third party)

(Y) / N

- New probe

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

(Y) / N

32. Are appropriate sampling procedures followed?

- Monitoring frequencies
- Sample collection (grab for pH, O&G, CN, phenols, VOCs)
- Flow proportioned samples
- Proper preservation techniques
- Sample holding times
- Chain-of-custody forms

(Y) / N
(Y) / N

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

(Y) / N

34. Laboratory conducting analyses:

North coast Environmental Labs
Streetsboro, OH

TOXICS MANAGEMENT

- 35. Are any listed toxic organics used in the facility? **BTEX** (Y) N
If yes, identify organics:

- 36. Does the facility have a current toxic organic management plan(TOMP)? Y (N)
If yes, is it being implemented? **Sample TTO 2/yr in lieu of TOMP** NAYIN

- 37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: (Y) N
POTW reported surfactants and concentrated inert solids incidents over past year.

- 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? **- Spill Plan** (Y) N

- 39. Identify any potential slug load or spill areas:
- No floor drains in process area

REQUIRED FOLLOW-UP ACTIONS

- Prepare Slug Discharge Control Plan