Ohio Environmental Protection Agency

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

August 29, 2012

Mr. Jim Spurlock
Schneider Electric North American Division
5735 College Corner Road
Oxford, Ohio 45056

RE: Schneider Electric/Square D, Oxford, Storm Water & IU Inspection Notice of Violation

Dear Mr. Spurlock:

On July 30, 2012, I conducted the annual Industrial User (IU) Inspection at the Schneider Electric facility in Oxford. You represented the facility. The facility is considered to be a Significant Industrial User (SIU) because the powder coat lines are considered to be metal finishing operations. These operations are regulated under the Metal Finishing Categorical Standard, 40 CFR 433.17. The inspection covered the receiving area for raw materials, the machining and assembly areas, the two powder coat lines, and the wastewater treatment area with the sampling location. The storm water inspection covered the outside storage areas and storm drains.

The facility has not submitted any self-monitoring reports for all of 2011 or the first half of 2012 (reports due 7/20/2011, 1/20/2012, and 7/20/2012). The sampling has been done, but the results have not been submitted. You were out for an extended period of time due to health issues. You have been working with James Roberts to get the past reports submitted, but they have not been submitted as of the date of this letter. The facility will receive an overall rating of marginal.

BREIF DESCRIPTION OF FACILITY

Schneider Electric manufactures electrical distribution equipment including bus duct and wire way products. The facility machines, coats and assembles the raw materials for use in industrial applications.

REGULATED FLOWS AND PRETREATMENT

Schneider generates regulated flow associated with the coating of parts. At the present time, there are two regulated sources. These are the two powder coat lines. The powder coat line is used to provide insulating properties to bars that will be used in bus ways for outdoor applications. The parts pass through an alkaline cleaner and an iron phosphate bath plus the associated rinses prior to being powder coated. The alkaline and iron phosphate tanks are heated with a closed loop heat exchanger. The parts

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then pass through the powder coat and into an oven for curing. The powder coat line has replaced the e-coat line, and eliminated the paint booth for custom colors. Custom colors can be placed directly over the normal gray color using the powder.

Each of the phosphating lines have a waste treatment system associated with them. These systems are used for pH neutralization. In addition, the wastewaters that are generated on-site are treated as described in previous inspections (report dated July 26, 2004). Production now runs one ten hour shift, four days a week. There is some production work on Fridays now through the rest of the year.

The facility is using its reverse osmosis (RO) system for its clean process water. The deionized water with a resin that was regenerated using acid and caustic has been removed, and reduced the risk associated with having the acid and caustic totes up on a mezzanine platform. The pH neutralization for this discharge is no longer needed. The RO reject water does not require any treatment.

With the iron phosphating and reverse osmosis installations, the facility no longer needs to treat its wastewater to meet its permit limits. The wastewater flows into the mix tank, and is then discharged to the sewer system directly from the mix tank. The sampling location for this was also discussed as part of the inspection.

Schneider is now recycling the Mylar used to wrap parts. Dupont took approximately 30 tons of it last year. The facility would like to go to a zero-landfill operation. The facility keeps approximately 95.9% of the waste from landfill through recycling. The cafeteria waste is what is going to the landfill now. There is an internal team working towards this goal. The facility is recycling its Lexan.

STORAGE AREAS

The outside storage areas are the same as in previous inspections (report dated July 26, 2004). The storm drains were also inspected. The cardboard recycling is outside. There are no other direct exposures of materials to storm water. The concrete around the facility was clean and free from stains. There was no discharge for the storm lines on the day of the inspection.

The Storm Water Pollution Prevention Plan (SWP3) must be updated to reflect the changes to the new General Industrial Storm Water Permit.

SAMPLING

The facility is sampling at Tank 5 Mix Tank. The sampling location is representative. The clear wells have been removed. The treatment equipment with the exception of the mix tanks and sludge handling equipment have been removed. The facility had switched contract laboratories after the February 2012 sampling event. The April 2012

sample was supposed to be picked up by the contract laboratory, but ended up sitting for six weeks. The facility has switched back to Test America.

The eDMR reports have not been submitted since 2011. The samples have been collected, but the data has not been reported. You have been working with James Roberts in our Central Office to try and resolve the issue. The data must be submitted immediately.

The Indirect Discharge Permit expired on June 30, 2012. The renewal application was submitted in June 2012.

REQUIRED ACTIONS

1) Schneider Electric/Square D Company must submit all of its required self-monitoring reports. This must be completed by September 28, 2012. Please continue to work with James Roberts on this matter. If there is a problem, contact me to see if additional time can be given.

2) Schneider Electric/Square D Company must update its Storm Water Pollution Prevention Plan (SWP3) to reflect the changes to the General Industrial Storm Water Permit. This must be completed by November 2, 2012.

The assistance you provided was appreciated. Should you have any questions regarding this report, feel free to contact me at (937) 285-6108.

Sincerely,

Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

ec: Ryan Laake, DSW/CO
cc: Jeff Ratliff, Oxford

MP/cc

Industrial Storm Water Compliance Evaluation Inspection;

Name of facility; **Schneider Electric/Square D Co.**

Address; **5735 College Corner Road, Oxford, Ohio 45056**

Permit number;**1GR00588*EG** Applicable permit sector;**AC1**

Date of visit; **07/30/2012** Time started; **12:15 pm** Time ended; **1:00 pm**

Facility representative(s); **Jim Spurlock**

OEPA inspector; **Mari Piekutowski**

SWP3;

A. Did the facility representative produce an SWP3? **Y ~~/ N / Not requested~~**

A1. Did it include a site map? **~~Y /~~ N**

A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y ~~/ N~~**

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y ~~/ N~~**

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **~~Y /~~ N**

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **~~Y / N /~~ NA**

Comments;

The SWP3 needs to be updated to reflect the new storm water permit. The facility does monthly walk throughs to ensure there are no storm water exposures. There is a site plan that is a part of the SPCC plant. The plan needs to reflect the new inspection requirements. Copies of the forms were made at the inspection.

Inspection records:

B. Were inspection records available? **Y~~/N~~**

Comments

These were existing forms used by the facility. They should be checked to ensure everything required in the new inspection forms are included.

Site Observations;

C. Are materials stored exposed to weather? Y ~~/ N~~. If Yes, list materials.

The cardboard recycling was outside. The solid waste dumpsters are outside. There was no evidence of material running into the storm drains.

D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens .

None noted.

E. No. outfalls from site/no. inspected ____/____

Checked storm drains on-site, but not outfalls. Mainly overland flow to Elams Run. Nothing noted in drains.

G. Did any show evidence of pollutants discharged in the storm water? ~~Y~~ / N

If yes, describe;

H. Other observations/comments;

Overall, the facility was well maintained. Materials are not stored where they are exposed to the elements. Raw materials are stored inside. There was a separate outside three-sided building for storage.

The SWP3 needs to be updated to reflect the requirements of the new multi-sector general permit for industrial storm water.

OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00031*BP	OHP000138	07/30/2012	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Schneider Electric North America Division 5735 College Corner Road Oxford, Ohio 45056	11:00 am	07/01/07
	Exit Time	Permit Expiration Date
	1:45 pm	06/30/12
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jim Spurlock, Safety & Environmental Manager	(513) 664-4100	
POTW Receiving Discharge	Categorical Standard(s) or Other Classifcation	
City of Oxford WWTP	40 CFR 433.17	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
M	Pretreatment				

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

See attached report.

Inspector	Reviewer
8/29/12	8/29/12
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date	Date

INDUSTRIAL USER INSPECTION CHECKLIST

Facility ***Schneider Electric Square D Co.*** Date of inspection: ***July 30, 2012***

OH Number: ***OHP000138*** IDP Number: ***1DP00031*BP***

Facility Representative: ***Jim Spurlock*** Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***June 22, 2011***

2. Has the facility been in compliance with its permit limits since the last inspection? ~~Y~~ / ~~N~~
   If no, explain:

The eDMRs have not been submitted since the report due January 20, 2011. The facility contact had been out due to an extended illness. The reports were supposed to have been submitted. The facility contact has been working with James Roberts on the eDMRs. Samples were collected, but the reports have not been received by Ohio EPA. The samples collected in April 2012 were collected, but not picked up by the contract laboratory.

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:

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

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***275***
6. Shifts/Day: ***1***
7. Production Days/Year: ***312***
8. Hours/shift: ***10 & 8***

9. Any production changes since the last inspection? ~~Y~~ / ~~N~~
   If yes, explain:

- The facility runs production four ten hour days. Office staff are there for five eight-hour days.

10. General facility description and operations:

Manufacture electrical distribution products.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

Copper
Aluminum
Steel
Dupont is taking the Mylar for recycling. The facility is trying to reduce the amount of waste going to the landfill. Eventually, they would like to be a zero-landfill facility. The facility is recycling the Lexan used at the plant. The facility will be changing suppliers. The new supplier will pay for the Mylar scrap. The facility is close to being a zero landfill facililty (95.9% recycled), but the waste from the cafeteria is a problem.

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

WASTEWATER TREATMENT

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

See attached schematics. The facility has eliminated its metals removal system since there is only iron phoshating occurring. With the installation of the RO system, the need for pH adjustment has also been eliminated. There are only 5 gallon/quarter of sulfuric acid on-site for use in the boiler room.

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? ***Removed metal treatment system since no longer need.*** ~~Y~~ / **N**

PTI Number: ***611922*** Date: ***June 13, 2007***

16. What is the treatment mode of operation? ~~Batch / Continuous /~~ **Combination**

If batch, list the frequency and duration:
There is continuous treatment, but it is released on a batch basis. A batch is released approximately once a day.

17. Who is responsible for operating the treatment system?
Bill Johnson, John Wittwer

18. How often is the treatment system checked?

The pH of each batch is tested prior to discharge. A continuous pH meter was installed in mid-April 2010.

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

pH alarms, level alarms. If the pH is out of range, then the system is shutdown

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

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

Pump parts.

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

Have bypasses occurred since the last inspection? ~~Y~~ / N

Was the POTW notified? ~~Y~~ /~~N~~

23. Are residuals or sludges generated? Y /~~N~~

Method of disposal:
Rumpke Landfill

Frequency and amount of disposal:

Approximately 200#/month or less. The sludge press was replaced with a smaller press. Tanks solids are removed from the tanks at the lines.

Name of hauler/landfill/disposal facility:

Rumpke Waste

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

The facility does an annual TCLP. No change. Not hazardous.

If land applying sludge, is there a sludge management plan? ***NA*** ~~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)	
Powder Coat	*End of Process*	Permit	Current	Permit	Current
			3,500		
Total Regulated Process Flow			*3,500*		
Non-Contact Cooling			*800*		
Blowdown			*5,000 week or month*		
Reverse Osmosis			*3500*		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW			*5,000 gpd*		

-The RO unit only discharges when on. Controlled by a float valve. Discharge once a shift.
- Non-contact cooling water blowdown based on conductivity.
- Boiler blowdown is closed loop to air handler. The flow is the volume in the boiler loop/HVAC.

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

The storm flow from the facility flows overland into Elams Run. The facility has coverage under the general industrial storm water permit. See attached report.

SELF MONITORING

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

The sampling manhole installed at the effluent pipe from the clear well.

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

The facility is sampling from the Tank 5 Mix Tank. The renewed permit will reflect the new sampling 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~~

If measured, how often is the meter calibrated?
There is a known volume in the tank. Water meter readings are also used as a backup to the volume of the tank.

If estimated, describe method of estimation:

30. Is pH monitored continuously? **Y** / ~~N~~
If yes, how often is the meter calibrated?
The probes are calibrated monthly. A two point (4 & 10) calibration done. Twice a year an outside service calibrates.

31. Does the facility collect its own samples? **Y** / ~~N~~
If no, specify the sample collector:

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 ***Time composited.*** **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:

Test America. The bottles are received from the lab preserved. After the February 2012 sampling event, the facility switched laboratories. The samples for April 2012 sat for six weeks waiting for the new laboratory to pick them up. The facility went back to Test America after that.

TOXICS MANAGEMENT

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

Clean up solvent (glycol ether) is used. Safety Kleen maintains these stations. They use mineral spirits. The rags that are used with solvent are collected by Safety Kleen. Most of the mineral spirits usage has been cut. They have been replaced with a water-based material. It is still used on copper because the other material does not evaporate quickly enough. The usage was reduced from eight drums a year to two drums a year.

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? ~~Y / N~~

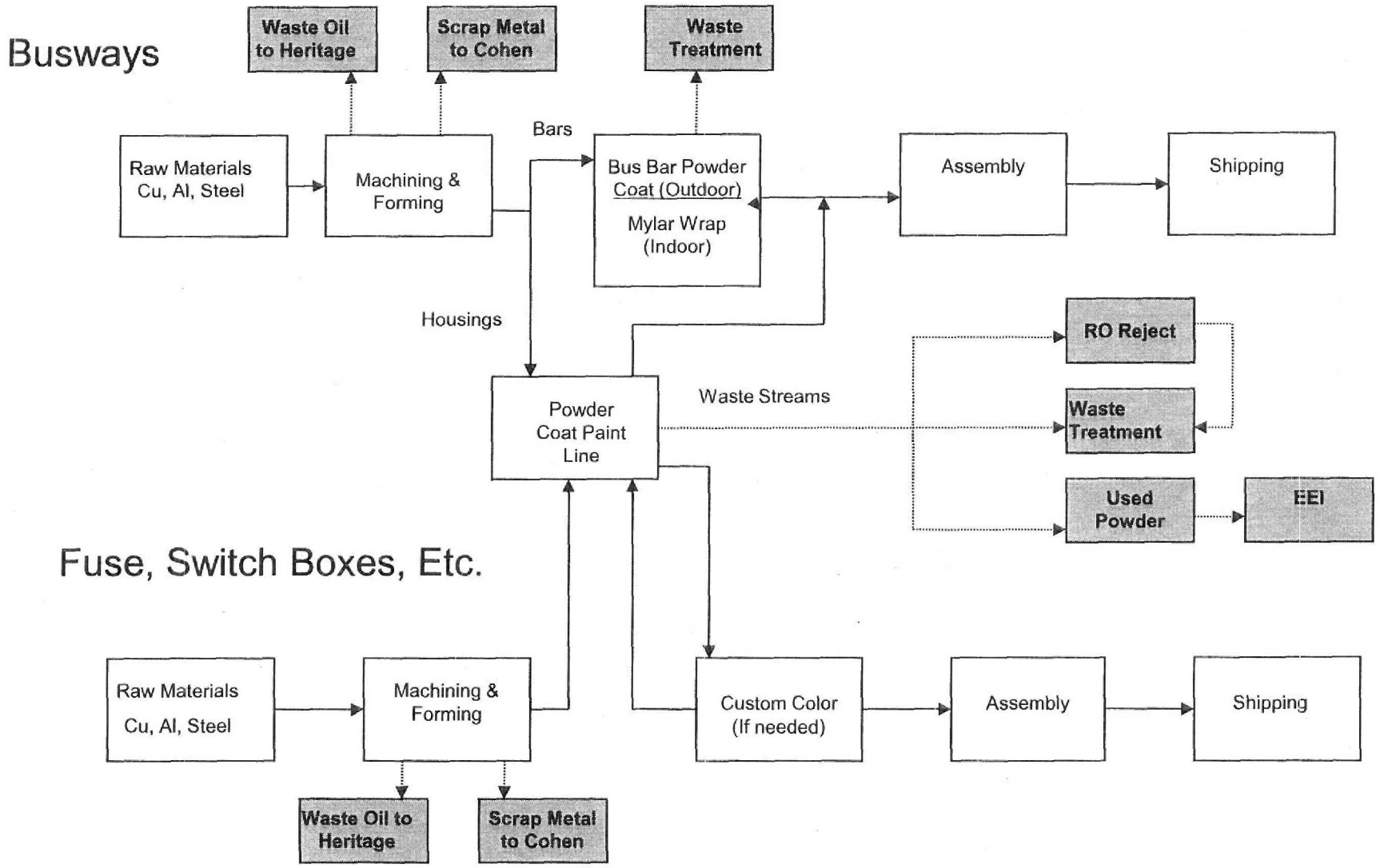
39. Identify any potential slug load or spill areas:

The facility has an SPCC for its fuel oil storage.

REQUIRED FOLLOW-UP ACTIONS

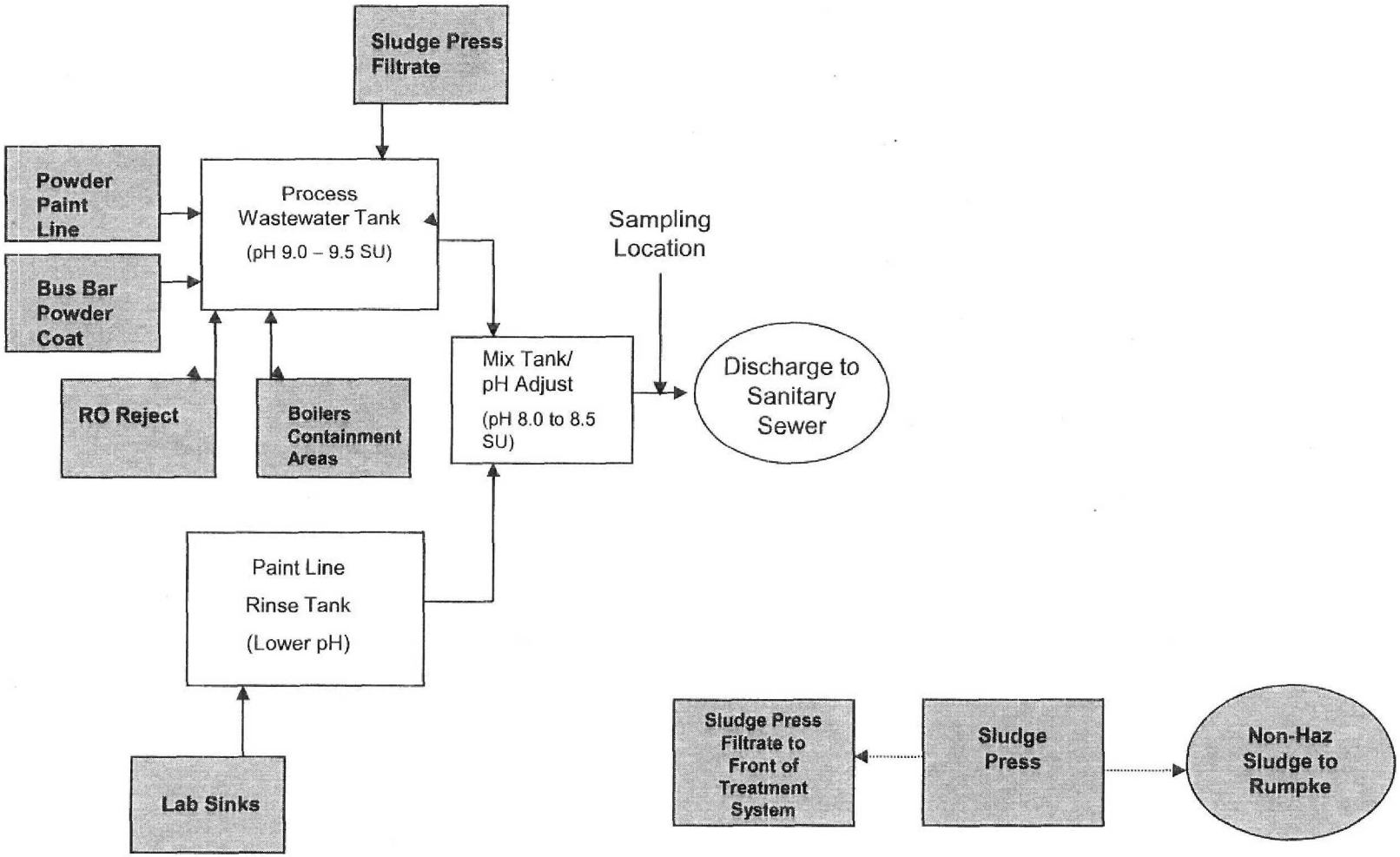
1) ***Schneider Electric/Square D must submit its self-monitoring reports for all of 2011 and the first half of 2012. This must be done immediately. (Note: The facility has been working with James Roberts because of issues with eDMR.)***

Process Schematic – Schneider Electric



July 8, 2011

Pretreatment Schematic Schneider Electric



August 28, 2012