



Environmental
Protection Agency

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

August 30, 2012

Mr. Iwan Gibby
American Showa, Inc., Blanchester Plant
960 Cherry Street
Blanchester, Ohio 45107

RE: American Showa, Inc., Blanchester, Storm Water & Annual Inspection, 2012

Dear Mr. Gibby:

On July 31, 2012, I conducted the storm water compliance inspection and annual pretreatment inspection at your facility. Judy Filson represented the facility. The facility is considered to be a significant industrial user (SIU) under Ohio Administrative Code (OAC) 3745-36-02(U)(2) which states, " Any other user that:....is designated as such by the director on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating and pretreatment standard or requirement." The inspection covered the casting areas, machining and assembly area, the pretreatment system, and the clean room. The storm water inspection covered a discussion of the storm water pollution prevention plan (SWP3), inspection records, and a walk through of the outside of the facility.

The facility has been in compliance with its discharge permit since the last inspection. American Showa is shifting the type of power steering unit being manufactured on site. Instead of the rack and pinion power steering units, there will be electric power steering units manufactured. The exact impact of the change was not known at the time of the inspection. The facility should keep Ohio EPA updated regarding the status of on-site equipment and manufacturing processes. American Showa Blanchester will receive an overall rating of satisfactory.

Brief Description of Facility

American Showa, Inc. (ASI) manufactures steering components and pumps. Parts are supplied to Honda, Subaru and Mazda. As part of the manufacturing process, casting, machining and assembly work are done.

Process Discharges and Pretreatment

The facility installed the additional rack line. There is no process wastewater associated with this installation. However, one of the rack lines will be removed from the site. This will not affect the volume of wastewater. All of the casting machines at the facility are on a chiller cooling system. The chiller system does not have a discharge to the village of Blanchester. The water from this closed loop system is disposed of off site by Ultra. The quench water is also being disposed of off site.

With the change in the product, it is not clear that all of the on-site casting, washing and machining equipment will be needed. Updates will be provided to Ohio EPA as information becomes available.

Storage Area

The used oils/coolants are recycled on site at the facility. There are two separate systems for the two products used in machining. The system uses stainless steel tanks for this. The tanks are contained within a diked spill containment area.

There are two separate roll-off boxes for the steel and aluminum scrap. These roll-off boxes are covered. The sumps that collect the waste coolant from the material are pumped back into a sump in the building for recycling. The aluminum scrap is taken by Quantum for recycling. The steel and dross from the casting process is stored in metal bins at the far end of the machining area. This material is taken off site by Sims to Honda Trading.

Sampling

The facility is sampling as required. The facility is sampling in the fire pit prior to entering the Village's collection system. There were no violations since the last inspection.

Storm Water Discharges

The facility has coverage under the multi-sector general industrial storm water permit. The Notice of Intent (NOI) was submitted as required. The facility has an SWP3 and Spill Prevention, Control and Countermeasures (SPCC) plan. Monthly inspections are being conducted for both of these plans. A wall was installed next to the road where truck traffic for the facility travels. This was done because storm flows were creating erosion issues. This has been resolved. There are empty totes and the scrap dumpsters stored outside. The scrap dumpsters are sealed to prevent any pollutants from being released during a storm event. The asphalt and concrete around the plant was worn. There were old stains on it, but no evidence of any new or ongoing staining.

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The storm water from these areas is routed from catch basins to an on-site storm water detention basin. There was no water in the basin on the day of the inspection. The storm pipes are discharged onto concrete channels in the basin to prevent erosion. There was cut grass and a small amount of standing water in the channels. The detention basin then discharges through vegetative cover into the stream adjacent to the property. There was no evidence of pollutants being discharged from the basin. Showa should review their SWP3 to make sure any of the changes needed for the new permit are included. This subsector does not have any sector specific sampling or requirements.

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

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

MP/tf

Enclosures

cc: Judy Filson, ASI
Ken Wilson, Blanchester
Ryan Laake, DSW/CO

Industrial Storm Water Compliance Evaluation Inspection;

Name of facility; American Showa, Inc.

Address; 960 Cherry Street, Blanchester, Ohio 45107

Permit number; 1GR00583*EG

Applicable permit sector; AB1

Date of visit; 7/31/2012

Time started; 11:00 am Time ended; 12:00 pm

Facility representative(s); Judy Filson

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;

Inspections are done on a monthly basis.

Inspection records:

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

Comments:

The facility may want to incorporate the new storm water form into the existing form.

Site Observations:

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

There are empty totes stored outside. The scrap dumpsters are also stored outside. These are sealed.

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 .

There is a storm water detention basin on-site. The storm water flows then flow through vegetation before reaching waters of the State. There was also a wall installed along the border of the property to prevent erosion of the drainage ditch.

E. No. outfalls from site/no. inspected 1 / 1 _

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

If yes, describe;

H. Other observations/comments;

The roadways around the facility have cracks and potholes that can detain storm water. There is no evidence this impacts the storm water discharges. There was some old staining by the scrap dumpsters. There was no indication at the time of the inspection of any pollutants being discharged.



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 |
| 1DP00000*EP | OHP000006 | 07/31/2012 | I | S | 1 |

| Section B: Facility Data | | |
|---|---|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| American Showa, Inc. Blanchester Plant 960 Cherry Street Blanchester, Ohio 45107 | 10:00 am | 03/01/2010 |
| | Exit Time | Permit Expiration Date |
| | 1:15 pm | 02/28/2015 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Judy Filson, Safety & Environmental Manager | (937) 783-4961x359 | |
| POTW Receiving Discharge | Categorical Standard(s) or Other Classification | |
| Village of Blanchester WWTP | Potential to Adversely Impact the POTW | |

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

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

See attached report.

| Inspector | Reviewer |
|--|---|
|  Marianne Piekutowski Division of Surface Water Southwest District Office Date: 8/29/12 |  Martyh Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 8/30/12 |

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *American Showa, Inc.*

Date of inspection: *July 31, 2012*

OH Number: *OHP000006*

IDP Number: *1DP00000*EP*

Facility Representative: *Judy Filson*

Inspector(s): *Mari Piekutowski*

COMPLIANCE

1. Date of last pretreatment inspection: *July 29, 2011*

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

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: *570*
6. Shifts/Day: *3*

7. Production Days/Year: *250 (5 day work week)*
8. Hours/shift: *8*
(May work an occasional Saturday, but not the whole plant.)

9. Any production changes since the last inspection? Y / N
If yes, explain:
The facility is bringing in a new power steering line. The manufacture and assembly associated with this change will impact the discharge from the plant. Updates will be provided as needed.

10. General facility description and operations:

Produce power steering components, gear boxes and pumps for automobiles. Die casting, machining and assembly are the primary manufacturing operations.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

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

There may be a reduction in production due to manufacturing changes.

WASTEWATER TREATMENT

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

Oil skimming, polymer addition, gravity separation.

See attached schematic.

Clay polymer is in use. The two oil skimmers are being used on existing tanks. There is only a small amount of flow (coolant) associated with the Power Steering Manufacturing. This is usually recycled. If the centrifuge is down, then this would go to waste treatment.

Normally recycle the coolants with the centrifuge, then it goes back out for use in the lines. The used oil is sent out and refined. The water and fines are removed, and the oils are sold as fuel. Enterprise Oil takes the oils. Ultra Environmental takes the wastewater from casting.

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: **NA** Date: **NA**

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

If batch, list the frequency and duration:

Wastewater is generated 24 hours a day, but treatment occurs for 8 hours a day on third shift (10:00pm to 7:00 am). The separation system operates on a continuous basis during this time. The clay/polymer system operates in batches during third shift.

17. Who is responsible for operating the treatment system?

Judy Filson and Chuck Pendergraft.

18. How often is the treatment system checked?

Hourly. Check the pit during shift to ensure that it doesn't overflow.

WASTEWATER TREATMENT CONTINUED

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

High level alarms on sumps and tanks.

20. Is there an operations and maintenance manual? **There is one for the clay/polymer system.** Y / N

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

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:

Recycle aluminum and steel turnings from machining operations.

Recycle metal sludge from machining coolant.

Waste oil to used oil tank (recycled).

Frequency and amount of disposal:

Machine Turnings: Unknown

Metal Sludge from Coolant: Unknown

Waste Oil: ~2000 gallons per month

Name of hauler/landfill/disposal facility:

Aluminum goes to Quantum.

Oil goes to Enterprise Oil (Located in Tennessee).

Coolant sludge goes to Quantum.

Nitol (isopropanol/acid material) used for surface testing. Taken by Clean Harbors.

Dross and steel goes by Sims to Honda Trading.

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

The caustic soda associated with casting is no longer being used. The facility is a conditionally exempt hazardous waste generator. Did not ship out any hazardous waste since the last inspection.

If land applying sludge, is there a sludge management plan? 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 |
| Cast Quenching | | 288 | (1) | | |
| Heat Treat Quench | | NA | 0 | NA | NA |
| Total Regulated Process Flow | | 0 | 0 | | |
| Unregulated Processes | | | | | |
| Cart & Floor Washing | End-of-Pipe | 1,400(2) | 1,400(2) | | |
| Parts Washing | End-of-Pipe | 520(2) | 1,730(3) | | |
| Machining Coolant (recycle 8,000 gal/mo coolant) | End-of-Pipe | 390(2) | 390(2) | | |
| Total Unregulated Process Flow | | 2,310(4) | 2,310(4) | | |
| Non-Contact Cooling | | Not factored into permit limits | (5) | | (1)~50 gal twice a year during shutdown. Hauled off-site. (2) Permit application lists these flows. Permit based on Metal Finishing flow of 2700 gpd but qualifying MF operations are no longer present. Flows are not measured. (3) These are dumped once a week. Flows are not measured. (4) Flows are not measured. (5) Unknown. Believed to be <200 gpd. (6) Actual reported flow are approximately 5,670 gpd which is based on a controlled discharge. |
| Blowdown | | -- | -- | | |
| Reverse Osmosis | | Not factored into permit limits | -- | | |
| Demineralizer Regeneration | | Not factored into permit limits | -- | | |
| Compressor Condensate | | Not factored into permit limits | -- | | |
| Boiler Condensate | | Not factored into permit limits | -- | | |
| Sanitary | | Not factored into permit limits | ~10,000 | | |
| Other Dilute Flows | | Not factored into permit limits | (5) | | |
| TOTAL FLOW | | 3,998 | 5,500(6) | | |

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

Occasionally, process wastewater from heat treat quench and cast quench is hauled off-site for treatment and disposal, but it is a small volume and is infrequent. The facility has coverage under the general industrial storm water permit. See attached form.

SELF MONITORING

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

The samples are collected in the fire pit at the Village's monitoring port.

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**

If measured, how often is the meter calibrated?

A flow meter was installed in June 2003. Data is recorded onto a removable drive. It is calibrated every six months to a year. Calibration sticker is placed on the unit.

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:

32. Are appropriate sampling procedures followed? Y / N
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:

Advanced Analytics Laboratories in Columbus

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / N
If yes, identify organics:
Parts washing solvent used in manufacturing, casting and maintenance departments contain 1,2,4-Trimethylbenzene. This is taken off-site for recycling by Crystal Clean.

36. Does the facility have a current toxic organic management plan(TOMP)? **NA** 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

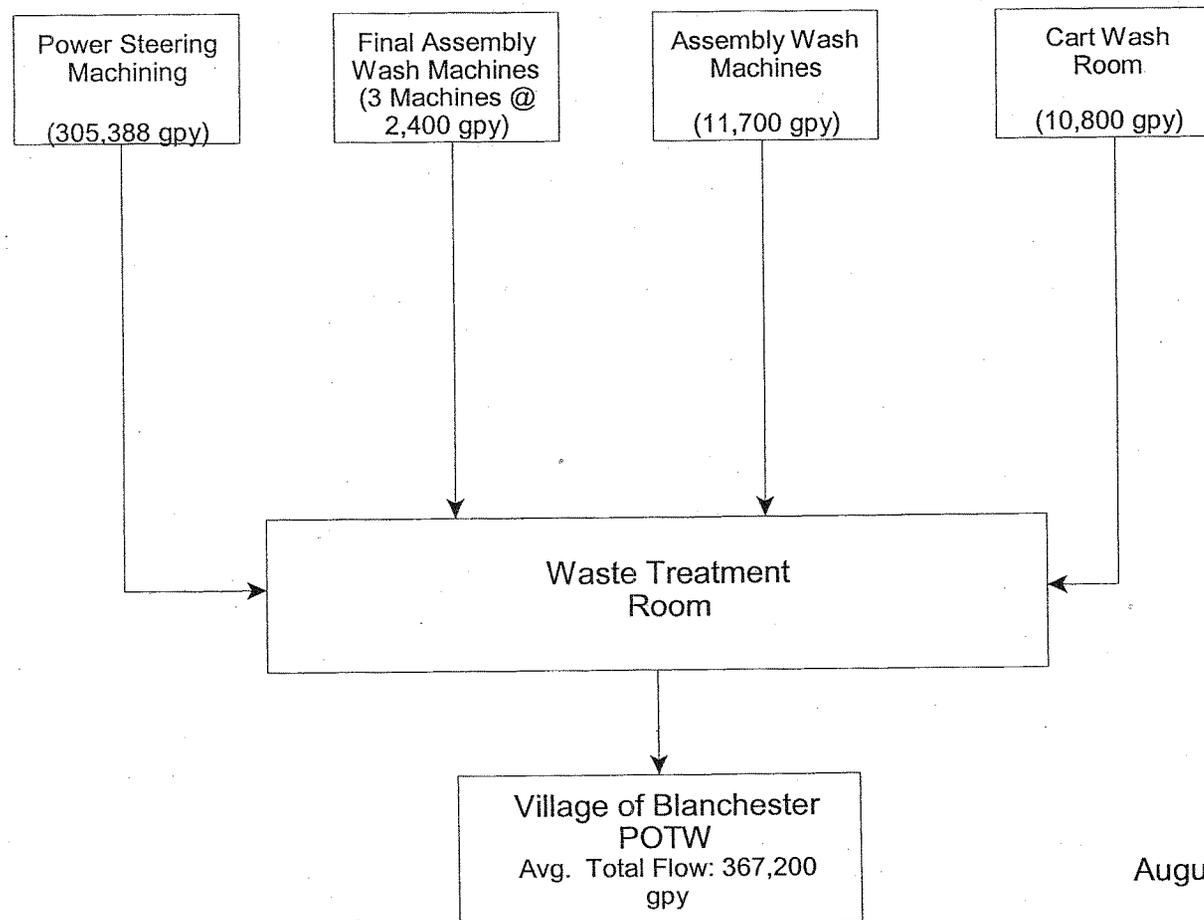
38. Does the facility need a spill prevention plan or slug discharge control plan? Y / N
If yes, does the facility have a written plan? Y / N

39. Identify any potential slug load or spill areas:
There was no reasonable potential. The facility maintains slug control and spill control plans as part of its contingencies. The facility also has its ISO 14001 certification.

REQUIRED FOLLOW-UP ACTIONS

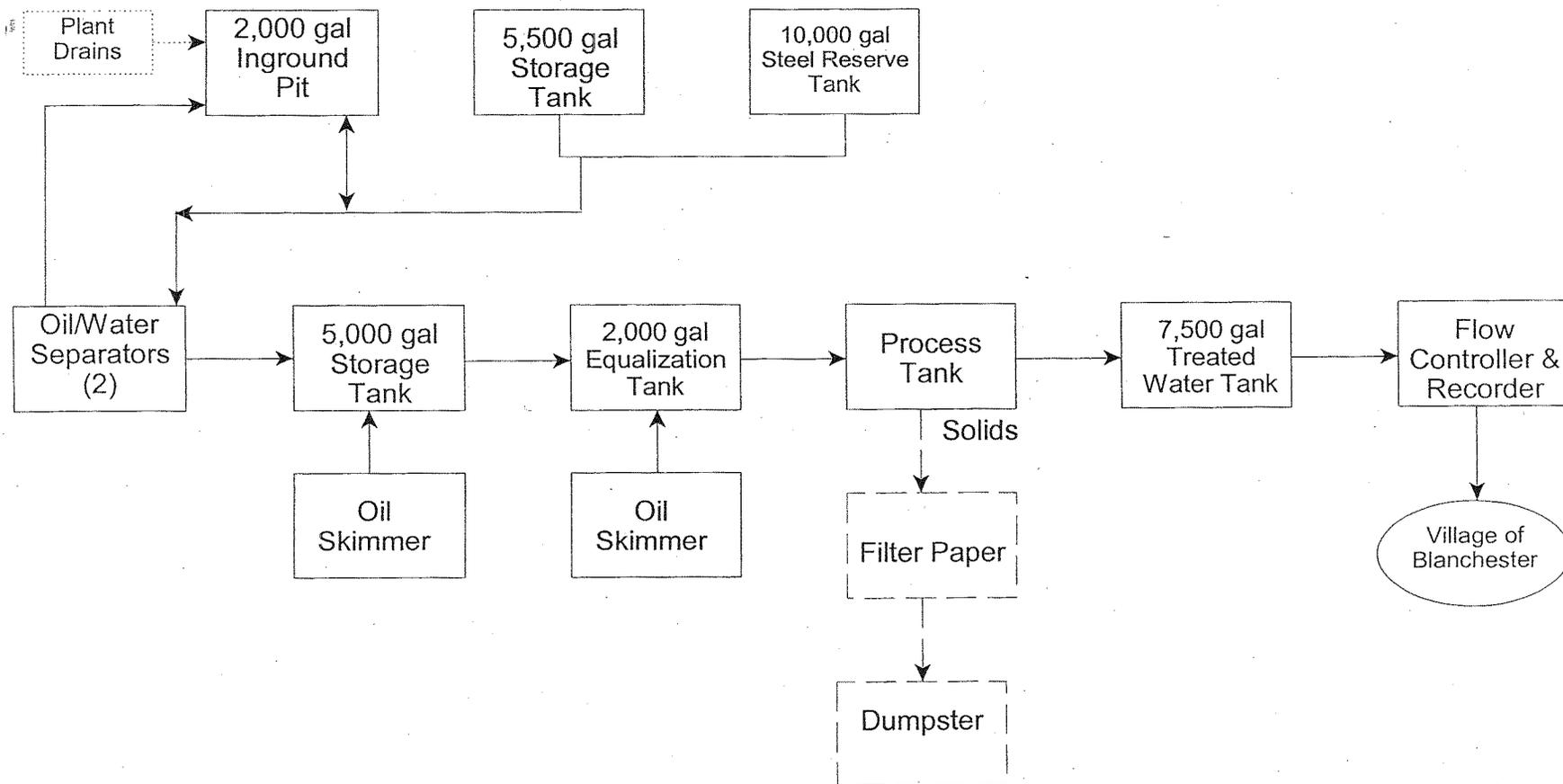
None.

American Showa Blanchester Plant Process Flow Schematic



August 26, 2004

American Showa Blanchester Plant Pretreatment Schematic



September 8, 2005