



**Environmental
Protection Agency**

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

Re: Auglaize County
Crown Equipment Corporation
Pretreatment

September 19, 2012

Mr. Doug Duerr
Corporate Environmental & Safety Engineer
40 South Washington Street
New Bremen, Ohio 45869

Dear Mr. Duerr:

On August 21, 2012, an inspection was conducted at Crown Equipment Corporation, 424 West Monroe Street, New Bremen, Auglaize County. You, Mr. Brian Duffy, and Ms. Tonja Rammel were present and provided information on the operations and maintenance at the plant. The inspection included a tour of the facility and completion of the enclosed checklist.

Wastewater is generated from a five stage parts washer, a three stage pit for the vibratory, and a three stage pit that was formally the Delta Oil/Water Separator. In January of 2012, the facility exceeded its maximum and monthly limits for zinc. The facility resampled and came back into compliance. The facility has been in compliance with the limits contained in its Indirect Discharge Permit (IDP) since that time.

During the inspection, the need for you to submit an updated toxic organics management plan (TOMP) was discussed. On September 6, 2012, we received your updated TOMP via email. We have reviewed the plan and find it acceptable. Until the expiration date of your Indirect Discharge Permit, you may in lieu of monitoring for total toxic organics (TTO), certify by submitting with your compliance report the following signed statement:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge report. I further certify that this facility is implementing the toxic organic management plan (TOMP) submitted to the Control Authority."

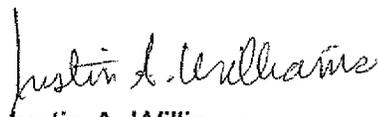
This certification will expire on the expiration date of your IDP. At that time, the TOMP must be updated and the waste streams must be sampled and analyzed for TTOs before you will be able to resume the TTO certification alternative. The information for the updated TOMP must be submitted with your renewal application for your IDP.

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If you are unable to make the certification statement or if conditions change at your facility that effect the use and/or storage of toxic organics, you must notify the Ohio EPA at least 60 days prior to the due date for filing the compliance report. At that time, Ohio EPA will determine the appropriateness of requiring sampling and analysis for toxic organics or continuing the certification authorization.

If there are any questions, please call me at (419) 373 – 3022.

Yours truly,



Justin A. Williams
Environmental Specialist II
Division of Surface Water

/jlm

Enclosure

pc: Mr. David Goodwin, Village of New Bremen Wastewater Superintendent

ec: Mr. Ryan Laake, CO – DSW
Inspection Tracking

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Crown Equipment Corporation**
OH Number: **OHP000040**
Facility Representatives: **Ms. Tonja Rammel,**
Mr. Doug Duerr, and Mr. Brian Duffy

Date of inspection: **August 21, 2012**
IDP Number: **2DP00015**
Inspector(s): **Mr. Justin Williams**

COMPLIANCE

1. Date of last pretreatment inspection: **August 26, 2010**

2. Has the facility been in compliance with its permit limits since the last inspection? **No**
If no, explain: **In January 2012 the facility exceeded its maximum and monthly zinc limits.**

3. Is the facility in compliance with all other requirements? **Yes**
Sampling procedures **Yes**
Reporting (late reporting, failure to report, etc) **Yes**
Compliance schedules **N/A**
Submitted BMR and 90 day compliance reports **N/A**
Any other requirements **N/A**

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? **No**
Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **2,200**
6. Shifts/Day: **3**
7. Production Days/Year: **260**
8. Hours/shift: **8**

9. Any production changes since the last inspection? **Yes**
If yes, explain:
Increased production.

10. General facility description and operations:
Manufacturer of lift trucks.

11. Any change in materials used in production since the last inspection? **No**
If yes, explain:

12. Any expansion or production increase expected within the next year? **Yes**
If yes, explain:
Expect demand to increase.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:
See DSW file – drawing in February 19, 2004 inspection
14. Was a PTI issued for the treatment system? **Yes**
15. Were there any modifications to the treatment system since the previous inspection? **No**
If yes, was a PTI obtained? **N/A**
PTI Number: _____ Date: _____
16. What is the treatment mode of operation? **Combination**
Batch in maintenance building and plant #3; continuous in plant #4.
If batch, list the frequency and duration:
Daily.
17. Who is responsible for operating the treatment system?
Doug coordinates sampling and pumping. Maintenance crews, supervisors, and group leaders perform checks on all shifts.
18. How often is the treatment system checked?
Daily.
19. Is there an alarm system for the system? **Yes**
Explain:
On the phosphate washer.
20. Is there an operations and maintenance manual? **Yes**
21. Is an inventory of critical spare parts maintained? **Yes**
If yes, list:
22. Are there any bypasses in the system? **No**
If yes, describe the location:

Have bypasses occurred since the last inspection? **N/A**
Was the POTW notified? **N/A**

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated? Yes

Method of disposal:

Hauled offsite.

Frequency and amount of disposal:

2,000 to 3,000 gallons every 3 to 4 months.

Name of hauler/landfill/disposal facility:

United Water Services, Cincinnati, OH.

Is any sludge generated subject to RCRA regulations? No

If land applying sludge, is there a sludge management plan? N/A

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. Vibratory			3,000 to 4,000		
2. Maintenance			0 to 1,500		
3. Phosphate Washer			4,500 to 6,000		
Total Regulated Process Flow			7,500 to 11,500		
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary			27,000		
TOTAL FLOW			34,500 to 38,500		

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

SELF MONITORING

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

Vibratory – settling basin outside plant #3.

Maintenance – discharge from the oil/water separator prior to drain.

Phosphate Washer – overflow from the settling basin at 5 – stage washer.

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

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

29. Is the flow measured or estimated? **Estimated**
If measured, how often is the meter calibrated?

NA

If estimated, describe method of estimation:

Flows from all three discharges are measured using a five gallon bucket and stop watch.

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

Checked three times per day, once each shift.

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

32. Are appropriate sampling procedures followed? **Yes**
Monitoring frequencies **Yes**
Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) **Yes**
Flow proportioned samples **Yes**
Proper preservation techniques **Yes**
Sample holding times **Yes**
Chain-of-custody forms **Yes**

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

34. Laboratory conducting analyses:

Belmont Labs.

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? **Yes**
If yes, identify organics:
MEK and IPA.
36. Does the facility have a current toxic organic management plan (TOMP)? **Yes**
If yes, is it being implemented? – **Plan will be updated and submitted for review.** **Yes**
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: **No**
38. Does the facility need a spill prevention plan or slug discharge control plan? **Yes**
If yes, does the facility have a written plan? **Yes**
39. Identify any potential slug load or spill areas:
None found.

REQUIRED FOLLOW-UP ACTIONS

Submit updated TOMP.