Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Putnam County
Production Products, Inc.
Pretreatment

September 21, 2012

Ms. Renee Guay
One Lyman East Hoyt Drive
Monroe, Michigan 48161

Dear Ms. Guay:

On September 12, 2012, an inspection of the pretreatment system serving Production Products Inc. (PPI) in Columbus Grove was conducted. You and Mr. Roger Briem were present and provided information on the wastewater generating processes and the oil/water separator.

The facility has a conveyor system installed in trenches below grade. Oil accumulates on the ground of the trench. Water is used to wash the area and is drained to a sump pit. This water is then pumped to a tote for offsite disposal. The dye wash station and floor scrubbing wastewater are the main sources of flow discharged through the oil/water separator to the Columbus Grove Wastewater Treatment Plant (WWTP). Dyes are washed approximately once per week in the wash station area. The dye wash water and the floor scrubbing wastewater flow into the screened catch basin that discharges to the oil/water separator. The discharge then flows to a pump station that pumps the wastewater to the Village of Columbus Grove WWTP.

A review of the Discharge Monitoring Reports (DMRs) for August 2011 to September 2012 shows that there have been several effluent limit violations for pH. The specific instances of non-compliance are enclosed on a separate sheet.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please contact me at (419) 373-3053.

Sincerely,

Ryan Gierhart
Division of Surface Water

/jlm

Enclosures

pc: Jeff Vance

ec: Ryan Laake, DSW, CO
Tracking

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

INDUSTRIAL USER INSPECTION CHECKLIST

Facility:	**Production Products Inc.**	Date of Inspection **09/12/2012**
OH Number:	**OHP000222**	IDP Number: **2DP00079*AP**
Facility Representative:	**Renee Guay, Roger Briem**	Inspector(s): **Ryan Gierhart**

COMPLIANCE

1. Date of last pretreatment inspection: 09/28/2011

2. Has the facility been in compliance with its permit limits since the last inspection? N
   If no, explain: **pH limit violations in August 2011 of 12.2 S.U. and February 2012 of 9.7 S.U.**

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

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **130**
6. Shifts/Day: **3**
7. Production Days/Year: **350**
8. Hours/shift: **8**

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

10. General facility description and operations:
Metal Stamping facility and some welding operations.

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

12. Any expansion or production increase expected within the next year? Y
    If yes, explain: **New addition is under construction. The expansion will include more stamping and welding facilities.**

WASTEWATER TREATMENT

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

From the Scale pits collect all the oil wastewater in a 500 gallon tank and ship it off site by Safety Clean. Dye wash area goes through 1500 gallon oil/water separator then is discharged to Columbus Grove WWTP.

Floor scrubbings are dumped into dye was area drain once a day at approximately 10 gallons a day.

14. Was a PTI issued for the treatment system? Y

15. Were there any modifications to the treatment system since the previous inspection? N

If yes, was a PTI obtained? N/A

PTI Number: Date:

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

If batch, list the frequency and duration:

Once a week dyes are washed. Once a day floor scrubbings are discharged.

17. Who is responsible for operating the treatment system?

Maintenance Department, Roger Briem, Maintenance Manager

18. How often is the treatment system checked?

Every 2 Months a sample is sent out

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

20. Is there an operations and maintenance manual? N

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

22. Are there any bypasses in the system? N
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? N

Very low volume of solids generated in oil water separator

Method of disposal:

Shipped off site by safety kleen

Frequency and amount of disposal:

Every 3 months

Name of hauler/landfill/disposal facility:

Safety kleen

Is any sludge generated subject to RCRA regulations? N

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. Dye Wash Water			600		
2. Floor Scrubbings			15		
3. Air Dryer Condensate					
4. Compressor Condensate					
5. Floor Drains in Receiving					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow					
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condenstate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary Approx. 100 Employee					
TOTAL FLOW					

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

SELF MONITORING

26. Sample location(s) described in the facility's permit:
Manhole next to office building, which is downstream of the oil water separator. The sanitary sewer ties into the same manhole. The approved PTI shows that the manhole(#3) installed prior to the sanitary line tying in. It was discussed that the process water sample needs to be separated from the sanitary wastewater. It was noted that the facility will look at installing a sampling port to isolate the process water.

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

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

29. Is the flow measured or estimated? Measured / **Estimated**

If measured, how often is the meter calibrated?

If estimated, describe method of estimation:
Production Rates and Population on site. Based on time to wash dyes.

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

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

32. Are appropriate sampling procedures followed?

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

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

34. Laboratory conducting analyses:
Alloway

TOXICS MANAGEMENT

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

36. Does the facility have a current toxic organic management plan(TOMP)? N/A
If yes, is it being implemented? N/A

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: N

38. Does the facility need a spill prevention plan or slug discharge control plan? Y
If yes, does the facility have a written plan? Y
They do train employees and new hires for 60 days after a change is made to the plan.

39. Identify any potential slug load or spill areas:
The detergent storage container in the dye wash area. The oil storage area next to the drain on the outside of the building.

REQUIRED FOLLOW-UP ACTIONS

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2DP00079*AP		001	00400	pH	1D Conc	9.0	12.2	8/29/2011
2DP00079*AP		001	00400	pH	1D Conc	9.0	9.7	2/16/2012