



**Environmental
Protection Agency**

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

September 25, 2012

RE: MEDINA COUNTY
SPENCER
SPENCER FORGE & MANUFACTURING
225 N. MAIN ST.
(NPDES NO. 3IS00087)

Spencer Forge & Manufacturing
PO Box 68
Spencer, OH 44275
Attn: Mr. Lee Hahner, VP

Dear Mr. Hahner:

On September 11, 2012, a meeting was held at the Spencer Forge & Manufacturing facility, located at 225 N. Main Street, Spencer, Medina County. The purpose of the meeting was to discuss the continuing non-compliance of Spencer Forge with its National Pollutant Discharge Elimination System (NPDES) permit to discharge, and to conduct a pre-permit renewal compliance inspection of the treatment facility. Present during the meeting were Messrs. Rod Twining and Ed Trent, representing Spencer Forge; and this writer, of the Ohio EPA.

Items discussed during the meeting with Messrs. Twining and Trent included the following:

- 1) A list of NPDES numeric effluent limit violations for the Spencer Forge & Manufacturing facility, since your NPDES permit went effective October 2005, was presented for discussion.
- 2) Mr. Twining was informed that, based upon data submitted to the Ohio EPA by Spencer Forge, the facility is considered to be in Significant Non-Compliance (SNC) for two parameters: Oil & Grease (O&G), and Total Suspended Solids (TSS). The attached document details the parameters in SNC for the last six-month period (February 2012 through August 2012).
- 3) Mr. Twining was also informed that facilities which are in SNC with their NPDES permit effluent limits, must be returned to compliance in a timely manner. The means by which an entity in SNC is brought back into compliance, and kept in compliance, is through a Compliance and Enforcement Plan developed by the District Office with jurisdiction over that entity.
- 4) SNC is defined by the USEPA as a 40% exceedance of specific conventional pollutant limits (1.4 x parameter effluent limit), or a 20% exceedance of toxic pollutant limits (1.2 x parameter effluent limit), at a given discharge point for any two or more months, during any two consecutive quarter period reviewed.
 - a) Conventional pollutants include: BOD/CBOD; total suspended solids; nutrients such as nitrogen (ammonia) and phosphorus; oil & grease.
 - b) Toxic pollutants include: total chlorine residual; heavy metals; cyanide.

- 5) Mr. Twining was also informed that the September 11th meeting was the initial step in the development and implementation of a plan to bring your facility back into compliance with your NPDES permit.
- 6) During the June 2011 inspection, it was determined that the location where the effluent sample was being collected was not totally correct. As described in the NPDES permit, the sampling location for Station 001 is: *Process effluent at outlet of oil/water separator, inside the shed which houses the separator.*

It was observed that the effluent from the oil/water separator shed discharged to a pond, which subsequently discharges to a storm ditch along the AC & Y railroad, then eventually to an un-named tributary of the East Branch of the Black River. The Station 001 samples were being collected at the outfall of the pond, not the oil/water separator shed outfall. It was also determined that the water in the pond could also include storm water runoff from roadside storm ditches and adjacent farm fields.

- 7) Upon discovery of the errant sample collection location, Mr. Twining made piping modifications (late July, early August 2011) to allow for Station 001 effluent sampling at the correct location, immediately following the oil/water separator, prior to its discharge to the pond.
- 8) It is noted that the change in sample collection location did result in several violation free months, but did not allow the Spencer Forge to come into continuous compliance, as there were violations in April and May 2012.
- 9) Further efforts to eliminate the O&G and TSS effluent violations have been made by Mr. Twining. In July 2012, the contents of the oil/water separator were pumped out and hauled away for disposal. A floating oil absorbent 'sock' was also placed in the last compartment of the oil/water separator, in an additional effort to capture any residual oil which may escape and cause effluent limit violations.
- 10) To date, there have been no effluent violations since May 2012.
- 11) Mr. Twining was informed that, should O&G and/or TSS effluent violations arise again, it is recommended the facility have the oil/water separator completely pumped, and high pressure cleaned, to remove all solids and traces of oil/grease in the separator. It is also recommended that the rope skimmer be thoroughly cleaned as well, and the rope portion of the rope skimmer be replaced with a new one.
- 12) Consultation with Ohio EPA/NEDO is to be made if O&G/TSS violations are observed twice in one quarter. If, after pressure washing the oil/water separator and rope skimmer the violations continue, a follow-up enforcement meeting will need to be held.
- 13) The purpose of the additional enforcement meeting will be to discuss the requirement of Spencer Forge installing a new, potentially larger sized oil/water separator, or making some type of process change, which will reduce O&G and TSS concentrations in the Station 001 effluent.

- 14) Spencer Forge will be required to submit a permit to install for any wastewater improvements, and agree to a construction schedule, if the facility remains in SNC.
- 15) The compliance enforcement plan which will be followed will also include annual inspections, and Notice of Violations (NOVs) if necessary.

Following the September 11th meeting, an inspection of the Spencer Forge oil / water separator was conducted. The last inspection conducted on the oil / water separator was on May 24, 2011.

A review of the compliance history for this facility, for the period of May 1, 2011 through September 12, 2012, was conducted utilizing data submitted in the electronic Discharge Monitoring Reports (eDMRs). The SWIMS data management tracking system found the following numeric effluent limits violations (based upon the data submitted to the Ohio EPA):

SPENCER FORGE & MANUFACTURING
NPDES PERMIT NO. 3IS00087
NUMERIC EFFLUENT VIOLATIONS
(May 1, 2011 – Sep. 1, 2012)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	Total Suspended Solids	30D Conc	13	22.	6/1/2011
August 2011	Total Suspended Solids	30D Conc	13	17.8	8/1/2011
August 2011	Oil and Grease, Total	1D Conc	8.9	9.4	8/9/2011
April 2012	Total Suspended Solids	30D Conc	13	17.5	4/1/2012
April 2012	Oil and Grease, Total	1D Conc	8.9	13.	4/17/2012
May 2012	Total Suspended Solids	30D Conc	13	30.3333	5/1/2012
May 2012	Total Suspended Solids	30D Qty	0.97	1.14812	5/1/2012
May 2012	Oil and Grease, Total	1D Conc	8.9	16.	5/3/2012
May 2012	Total Suspended Solids	1D Conc	36	52.	5/31/2012
May 2012	Oil and Grease, Total	1D Conc	8.9	52.	5/31/2012
May 2012	Oil and Grease, Total	1D Qty	0.65	1.9682	5/31/2012

Other items discussed during the September 11th inspection:

- Effluent samples are collected by Mr. Twining, in bottles provided by Alloway labs. The bottles are provided with all necessary preservatives already in them.
- The samples are sent to the lab in iced, security taped containers, and a chain of custody form for tracking of the samples is employed by Spencer Forge and their analytical lab.
- As a reminder, O&G samples are to be collected directly into a glass container, and sealed with a Teflon lined lid. The O&G sample should not be collected in one container, then transferred to another for analysis.
- Present employment at the Spencer Forge facility is approximately 50 persons. The number of employees has varied between 45 and 100 persons.

- Akron Waste Oil hauls away the oil collected from the oil/water separator. The skimmer was last pumped in late July / early August 2012, and approximately 3 tanker loads of 2000 gallons were hauled.
- Sanitary wastewater generated at the facility is directed to the Spencer WWTP for treatment.
- Flow values submitted in monthly reports to Ohio EPA are estimated. Since the NPDES permit contains loading limits on some pollutants, the actual flow should be reported.
- A flow meter is in place at the oil/water separator discharge. The flow meter recording chart has been replaced within the past few years. However, the Mag Meter is not operative, and must be repaired or replaced.

Please inform this office, in writing, when the flow meter has been repaired / replaced, as a follow-up verification inspection will need to be made

Spencer Forge should continue with all efforts that will enable its facility to consistently meet its NPDES permit limits.

If there are any comments or questions concerning this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/cs

SPENCER FORGE MFG.
NPDES PERMIT NO. 3IS00087
SIGNIFICANT NON COMPLIANCE PARAMETERS
(FEB. 2012 – AUG. 2012)

Permit: 3IS00087

Period: 2/1/2012 7/31/2012

Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
Spencer Forge	Apr 2012	001	00530	Total Suspended Solids	30D Conc	13	17.5	4/1/2012
Spencer Forge	May 2012	001	00530	Total Suspended Solids	30D Conc	13	30.3333	5/1/2012
Spencer Forge	May 2012	001	00530	Total Suspended Solids	30D Qty	0.97	1.14812	5/1/2012
Spencer Forge	May 2012	001	00530	Total Suspended Solids	1D Conc	36	52.	5/31/2012
Spencer Forge	Apr 2012	001	00550	Oil and Grease, Total	1D Conc	8.9	13.	4/17/2012
Spencer Forge	May 2012	001	00550	Oil and Grease, Total	1D Conc	8.9	16.	5/3/2012
Spencer Forge	May 2012	001	00550	Oil and Grease, Total	1D Qty	0.65	1.9682	5/31/2012
Spencer Forge	May 2012	001	00550	Oil and Grease, Total	1D Conc	8.9	52.	5/31/2012