Ohio | Environmental Protection Agency

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

October 2, 2012

Ms. Opal Sizemore
Miamisburg Coating
925 North Main Street
Miamisburg, Ohio 45342

RE: Miamisburg Coating, Miamisburg, Storm Water and IU Inspection

Dear Ms. Sizemore:

On September 12, 2012, I conducted the annual industrial user (IU) inspection and a storm water reconnaissance inspection at the Miamisburg Coating facility. You represented the facility. The facility is considered to be a significant industrial user (SIU) as defined in Ohio Administrative Code (OAC) 3745-36-02(U)(1) due to the fact that the facility is subject to categorical standards. Because of the iron phosphating operation, the facility is regulated under 40 CFR 433.17, New Source Metal Finishing Standard. The inspection covered the iron phosphating line and the outside of the facility.

The facility will receive a rating of satisfactory. The facility applied for coverage under the new general industrial storm water permit at the beginning of the year. You had received a request for additional information for the application. As part of the inspection, we found the additional information. In addition, the information and checklist for receiving a 'NO EXPOSURE' certification for your storm water was provided. The inspection of the outside of the building showed you met all of the criteria necessary to apply for this certification.

Brief Description of Facility

Miamisburg Coating is a job shop facility. The facility coats rebar for concrete work with an epoxy coating. To prepare the surface of the rebar, the parts are iron phosphated as a surface preparation to accept the epoxy coating. This line was operating during the inspection. Most of the work that is currently being done at the facility is sandblasting.

Regulated Flows and Pretreatment

There has been no discharge from the iron phosphating line during the past year. The facility has been submitting its self-monitoring reports as required. The reports use the "AL" code since there is no discharge. The sandblasting work that is being done does

not have a discharge. The oven on the unit is being used. The water rinse tank is also being used, but there is no discharge. Evaporative losses require make up water be added. On the day of the inspection, there was no production.

The assistance provided 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: Dave Reinker, Miamisburg
Ryan Laake, DSW/CO

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**
OHP000185	1DP00043*BP	09/12/2012	1	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Miamisburg Coating 925 North Main Street Miamisburg, Ohio 45342	8:00 am	11/1/2008
	Exit Time	**Permit Expiration Date**
	8:50 am	10/31/2013
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Opal Sizemore, President	937.866.1323	
POTW Receiving Discharge	**Categorical Standard(s) or Other Classifcation**	
City of Miamisburg	40 CFR 433.17	

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
10/12/12	10/2/2012
Marianne Piekutowski Date Division of Surface Water Southwest District Office	Martyn Burt Date Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***Miamisburg Coating***

Date of inspection: ***September 12, 2012***

OH Number: ***OHP000185***

IDP Number: ***1DP00043*BP***

Facility Representative: ***Opal Sizemore***

Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***August 18, 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: ***4; Office 1 part-time*** 6. Shifts/Day: ***1***

7. Production Days/Year: ***100 (maybe a little more)*** 8. Hours/shift: ***8***

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

One pump (rinse) on the phosphate line is broken. The only part of the line being used is for painting. The majority of the work is still sandblasting, and does not have a discharge.

10. General facility description and operations:

Job shop. The facility provides iron phosphating with an epoxy coating for rebar for the construction industry.

FACILITY OPERATIONAL CHARACTERISTICS (CONTINUED)

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

The facility uses iron phosphate.

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:

There is no pretreatment system. The rinse tank andiron phosphating tank would be discharged at the same time so they neutralize each other.

14. Was a PTI issued for the treatment system? ***NA*** ~~Y / N~~

15. Were there any modifications to the treatment system since the previous inspection? ***NA*** ~~Y / N~~

    If yes, was a PTI obtained? ***NA*** ~~Y / N~~

    PTI Number: Date:

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

    If batch, list the frequency and duration:

The facility may discharge once or twice a year. During the past year, there was no discharge.

17. Who is responsible for operating the treatment system?
Tim Sizemore oversees the line.

18. How often is the treatment system checked?

NA

WASTEWATER TREATMENT (CONTINUED)

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

NA

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

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

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

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

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

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

Method of disposal:

All of the waste from the iron phosphating line is discharged to the sewer system. Solids are redissolved with water and discharged.

Frequency and amount of disposal:

Name of hauler/landfill/disposal facility:

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

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)	
		Permit	Current	Permit	Current
Iron Phosphate Line	*End of Process*	*1,950*	*0*		
Total Regulated Process Flow					
Non-Contact Cooling					
Blowdown					
Reverse Osmosis					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW					

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

The facility has applied for coverage under the general industrial storm water permit. However, the "No Exposure" certification would be more applicable. The information was provided for this.

SELF MONITORING

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

The process wastewater drain pipe effluent prior to entering the main sewer.

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

There hasn't been any sampling done since there is no discharge.

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?

If estimated, describe method of estimation:
Based on the volume of the tanks being discharged.

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:

The facility will be collecting their own samples when they discharge, but there hasn't been a discharge.

32. Are appropriate sampling procedures followed?

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

33. Are samples analyzed in accordance with 40 CFR 136? ***NA*** ~~Y / N~~

34. Laboratory conducting analyses:

The facility has not yet selected a contract laboratory.

TOXICS MANAGEMENT

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

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**

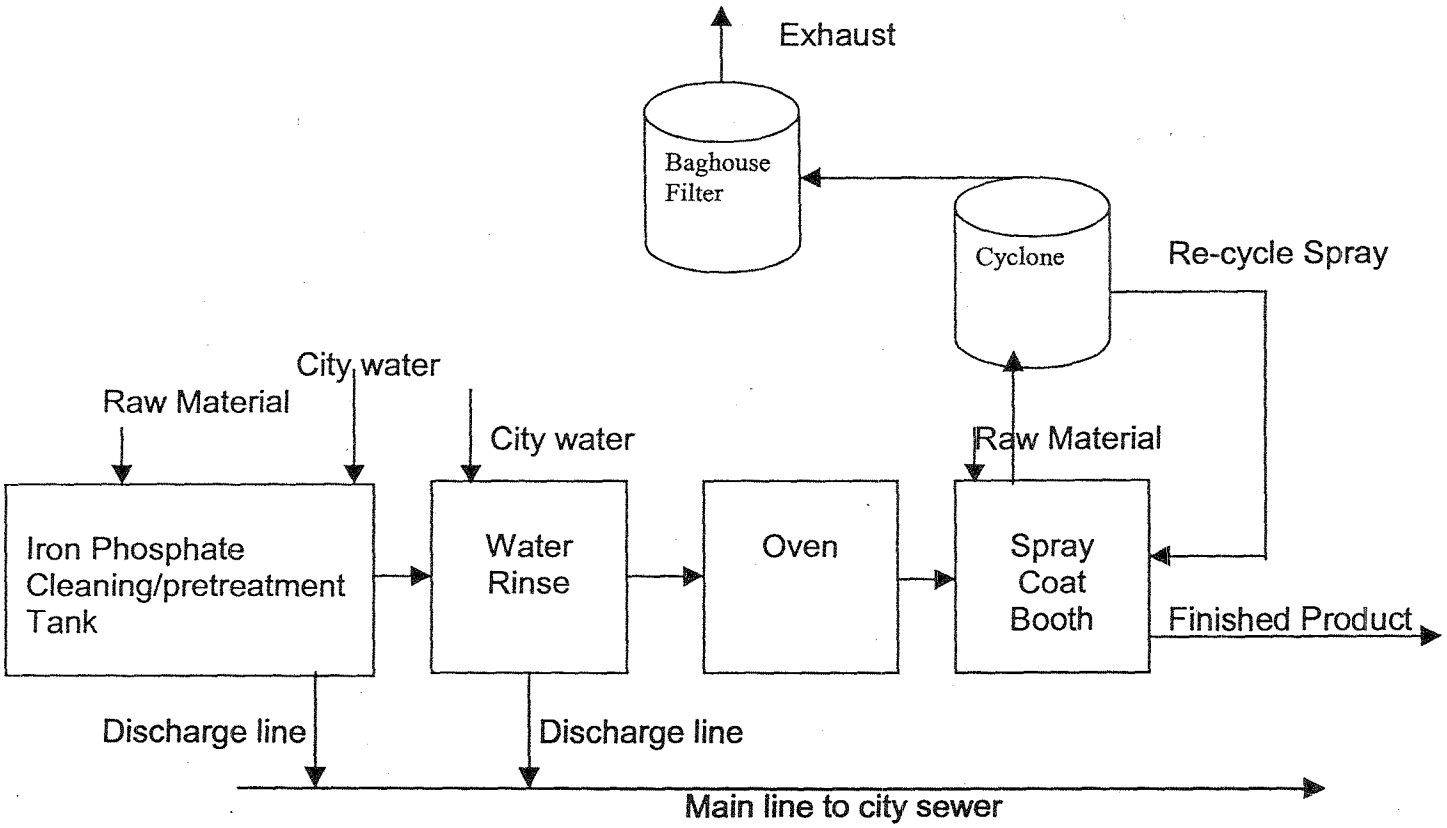
If yes, does the facility have a written plan? ~~Y~~ / ~~N~~

39. Identify any potential slug load or spill areas:

None noted.

REQUIRED FOLLOW-UP ACTIONS

None.



Process Flow Diagram

Industrial Storm Water Reconnaissance Inspection;

Name of facility: ***Miamisburg Coating***

Address: ***925 North Main Street, Miamisburg, Ohio 45342***

Permit number: ***1GR00654*DG*** Applicable permit sector: ***AA2***

Date of visit: ***09/12/12*** Time started: 8:00 am Time ended;

Facility representative(s): ***Opal Sizemore***

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;

Did not review SWP3. The facility should apply for coverage under 'NO EXPOSURE' certification.

Inspection records:

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

Comments:

As part of the inspection, potential storm water exposures were evaluated with a site visit. There is no outside storage, shipping, refueling etc. There are no air pollution control devices outside the facility.

Site Observations;

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

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 .

The roof drains go to a grassy area between the building and onto the parking lot which is surrounded with small grassy drainage ways.

E. No. outfalls from site/no. inspected ***0/0***

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

If yes, describe;

H. Other observations/comments;

There was a line for condensate from an air compressor and the sprinkler line outside the building. There were no storm water exposures noted on the site. The facility should apply for 'NO EXPOSURE' certification instead of the general industrial permit.