



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

Re: Hancock County
GROB Systems, Inc.
Pretreatment

November 1, 2012

Mr. Brent Wasson
Management Representative
GROB Systems, Inc.
1070 Navajo Drive
Bluffton, Ohio 45817

Dear Mr. Wasson:

On September 20, 2012, an inspection was conducted at GROB Systems, Inc., 1070 Navajo Drive, Bluffton, Hancock County. You and Mr. Thomas Weber of Wastewater Management, Inc., were present and provided information on the operations and maintenance at the plant. The inspection included a tour of the facility and the completion of the enclosed inspection report. All process wastewater is generated from a phosphate coating process.

During the inspection, Mr. Weber questioned whether the local limits for copper truly applied at end-of-process or if they should be applied at end-of-pipe. The Village of Bluffton does not have an approved pretreatment program; therefore, the Village does not have its own technically based local limits. The maximum and monthly copper limits applied to the indirect discharge permit (IDP) for GROB System Inc. were calculated using our indirect discharger waste load allocation model. That model does not include dilution sources; therefore, the values it calculates are only end-of-process limits.

Also during the inspection, an evaluation of your No Exposure Certification was conducted. During the evaluation, it was observed that several metal dumpsters, used to store recyclables, were stationed outside and, therefore, exposed to storm water. The dumpsters were not covered and did not appear to be of a leak proof design. They were also located in an area that directly drains to the facility's storm sewers. It also appeared that the dumpsters were loaded and unloaded in an area that is exposed to storm water. To maintain your No Exposure Certification, you must move these dumpsters and store them in an area that is not exposed to storm water and you must load and unload the dumpsters in an area that is not

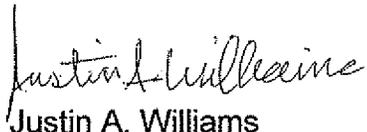
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exposed to storm water. **Within 30 days** of the date of this letter, submit written and photographic documentation that these changes have been made. If these changes are not possible for your facility at this time, **within 30 days** of the date of this letter, you must then submit a Notice of Intent (NOI) for coverage under the Industrial Storm Water General Permit. The NOI is available at the following website:

http://epa.ohio.gov/portals/35/documents/NOI_form2_fis.pdf

If there are any questions regarding the inspection, please call me at (419) 373 – 3022. Please direct any Industrial Storm Water General Permit questions to Ms. Lynette Hablitzel at (419) 373 – 3009.

Yours truly,



Justin A. Williams
Environmental Specialist II
Division of Surface Water

/jlm

Enclosure

pc: Mr. Thomas Weber, Wastewater Management, Inc.
Mr. Dan Bowden, Wastewater Superintendent, Village of Bluffton

ec: Mr. Ryan Laake – CO – DSW
Ms. Lynette Hablitzel, P.E. – NWDO, DSW
Inspection Tracking

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: GROB Systems, Inc.

OH Number: OHP000257

Facility Representative(s): Brent Wasson

Date of inspection: 09/20/2012

IDP Number: ZDP00089

Inspector(s): Justin Williams

COMPLIANCE

1. Date of last pretreatment inspection: N/A, fist inspection.

Yes	No	N/A
X		

2. Has the facility been in compliance with its permit limits since the last inspection?

If no, explain: _____

3. Is the facility in compliance with all other requirements?

- Sampling procedures
- Reporting (late reporting, failure to report, etc)
- Compliance schedules
- Submitted BMR and 90 day compliance reports
- Any other requirements

X		
X		
X		
		X
		X

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?

		X
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Explain any unresolved actions: _____

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 310

7. Production Days/Year: 249

6. 2 Shifts/Day: 5 Day/Week

8. Hours/Shift: 8

9. Any production changes since the last inspection?

If yes, explain: _____

Yes	No
	X

10. General facility description and operations: Design and manufacture of special equipment for automotive machining, assembly, testing and handling.

11. Any change in materials used in production since the last inspection?

If yes, explain: _____

	X
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12. Any expansion or production increase expected within the next year?

If yes, explain: Expanding manufacturing facility by 90,000 ft²

X	
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WASTEWATER TREATMENT

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

N/A -- no treatment provided.

14. Was a PTI issued for the treatment system?

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

If yes, was a PTI obtained?

PTI Number: N/A

Date: N/A

Yes	No
	X
	X

Batch	Continuous	Combination
		X

16. What is the treatment mode of operation?

If batch, list the frequency and duration: Daily – 1st shift intermittent

17. Who is responsible for operating the treatment system? N/A

18. How often is the treatment system checked? N/A

Yes	No	N/A
		X

19. Is there an alarm system for the system?

Explain: _____

20. Is there an operations and maintenance manual?

		X
		X

21. Is an inventory of critical spare parts maintained?

If yes, list: _____

22. Are there any bypasses in the system?

If yes, describe the location: _____

Have bypasses occurred since the last inspection?

Was the POTW notified?

	X	
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		X
		X
	X	

23. Are residuals or sludges generated?

Method of disposal: _____

Frequency and amount of disposal: _____ / _____

Name of hauler/landfill/disposal facility: _____

Is any sludge generated subject to RCRA regulations?

If land applying sludge, is there a sludge management plan?

		X
		X

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
Phosphate Coating			406		
Total Regulated Process Flow			406		
Noncontact Cooling					
Blowdown					
Reverse Osmosis					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm water					
Other Dilute Flows					
Unregulated Flows(provide list)					
Sanitary					
TOTAL FLOW			406		

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: Wash booth containment pit.

Yes	No
X	

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

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

X	
Measured	Estimated
X	

29. Is the flow measured or estimated?

If measured, how often is the meter calibrated? Every 5 years per manufacturer.

If estimated, describe method of estimation: _____

Yes	No
	X

30. Is pH monitored continuously?

If yes, how often is the meter calibrated? _____

31. Does the facility collect its own samples?

If no, specify the sample collector: Brent Wasson

X	
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Are appropriate sampling procedures followed?

Monitoring frequencies

Sample collection (grab for pH, O&G, CN, phenols, VOCs)

Flow proportioned samples

Proper preservation techniques

Sample holding times

Chain-of-custody forms

X	
X	
X	
X	
X	
X	
X	
X	

32. Are samples analyzed in accordance with 40 CFR 136?

33. Laboratory conducting analyses: Water & Wastewater Laboratories, Inc.

TOXICS MANAGEMENT

34. Are any listed toxic organics used in the facility?

If yes, identify organics: Paint Products

Yes	No
X	

35. Does the facility have a current toxic organic management plan (TOMP)?

If yes, is it being implemented?

	X
	X

36. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection?

If yes, please explain: _____

37. Does the facility need a spill prevention plan or slug discharge control plan?

If yes, does the facility have a written plan?

	X

38. Identify any potential slug load or spill areas: _____

REQUIRED FOLLOW-UP ACTIONS
