

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

November 14, 2012

RE: 3DP00034\*DP  
WORTHINGTON CYLINDERS  
INDUSTRIAL USER INSPECTION  
JEFFERSON  
ASHTABULA COUNTY

Shelly DeGennaro  
Worthington Cylinders  
863 State Route 307 East  
Jefferson, OH 44047

Dear Ms. DeGennaro:

On October 17, 2012, representatives of this office conducted an Industrial User Inspection of the above facility. The Ohio EPA was represented by Donna Kniss and Ryan Laake. Daniel Brubaker and Jeff Priestap represented the company. Worthington Cylinders discharges waste water to the Village of Jefferson WWTP and has been issued Indirect Discharge (IDP) permit 3DP00034\*DP. The purpose of the inspection was to evaluate compliance with the existing IDP.

Worthington Cylinders currently employs approximately 180 people in a 5 day/week, 3 shift/day schedule, without extended shutdown periods. The facility fabricates, coats, and paints heating cylinders, fire extinguishers, and other tanks. The tanks are processed through an iron phosphating line or zinc phosphating line prior to powder coating.

The iron phosphating line consists of five stages: 1) alkaline cleaner, 2) rinse, 3) phosphating, 4) rinse, and 5) rinse. Overflows for the rinse tanks have been discharged untreated to the sanitary sewer system for a number of years without incident. Worthington has installed an eight stage zinc phosphating lines; the stages are: 1) rack rinse, 2) rack stripper, 3) alkaline cleaner, 4) hot rinse, 5) cold rinse, 6) zinc phosphating, 7) rinse, and 8) "lube." The overflows from stages 1 and 7 are routed to a treatment system before discharge to the sanitary sewer. The other rinse overflows are routed directly to the sewer system. Worthington Cylinders is subject to 40 CFR 433.17, Metal Finishing, and the sampling manhole contains only regulated wastewaters. Microbac collects and analyzes the samples.

A review of the discharge monitoring data from July 2009 to July 2012 showed incorrect detection limits for some parameters, which was determined to be due to unit conversion errors. Please submit corrected eDMRs for 2011 and 2012. There was one zinc permit limit violation in July 2010.

SHELLY DEGENNARO  
NOVEMBER 14, 2012  
PAGE 2

Please respond to the issue noted above within 30 days of the receipt of this letter. If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached via e-mail at [donna.kniss@epa.state.oh.us](mailto:donna.kniss@epa.state.oh.us).

Sincerely,



Donna J. Kniss  
District Engineer  
Division of Surface Water  
Northeast District Office

DJK:bo

pc: Gary Licate, Village of Jefferson  
Elaine Veth, Worthington Industries, 6303 County Road 10, Delta, OH 43515  
Ryan Laake, DSW CO

ec: John Schmidt, DSW NEDO

File: Pretreatment Industrial User/Permit-Compliance