



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

December 19, 2012

Mr. Tim Scott
PCP Champion/Surgical Appliances
300 Congress Avenue
Ripley, Ohio 45167

**RE: PCP CHAMPION, RIPLEY, ANNUAL INSPECTION
NOTICE OF VIOLATION**

Dear Mr. Scott:

On December 12, 2012, I conducted the annual Industrial User (IU) Inspection at your Facility. You represented the Facility. The Facility is regulated under the Metal Finishing Existing Source Categorical Standard, 40 CFR 433.15. The inspection covered the plating area, the pretreatment system, the machining area, the chemical storage area, and the sampling point.

The Facility had a frequency violation since the last inspection. In December 2011, the Facility did not collect the required samples. Ohio EPA was notified of the error. The next six months of samples were collected as required. The self-monitoring reports are submitted using eDMR. The Facility included the Total Toxic Organics (TTOs) Certification Statement into the "Notes" pop-up box for the second half of 2011. The TTOs were sampled in June 2012 as part of the permit renewal and update of the Toxic Organics Management Plan (TOMP). Ohio EPA is in the processing of reviewing the updated TOMP. The Facility will receive an overall rating of satisfactory.

Brief Description of Facility

PCP Champion manufactures orthopedic and convalescent equipment. The Facility receives steel and aluminum tubing, as well as plastic parts, to fabricate and assemble into various products. The Facility is also producing a neoprene knee brace.

Regulated Wastewater Flow

The sources of wastewater have not changed since previous inspections (report dated December 23, 1993). The total volume of chrome/nickel plating is still down. The plating only runs two or three days a week. More and more of the work at the Facility is being powder coated off-site. The Facility is importing plastics and colors. However, some products are being brought back to the US.

The renewal application for the Facility's permit to discharge to the Village was submitted, and the permit was renewed. The new permit is effective on January 1, 2013, and expires on December 31, 2017.

Sampling

The Facility takes four grab samples throughout the operational day at the Facility. These samples are composited and then analyzed. In December 2011, samples were not collected. The Facility called Ohio EPA, and notified the agency of the error. The correct numbers of samples were collected for the next report. This inspection report will serve as the Notice of Violation for this frequency violation. The Facility has returned to compliance.

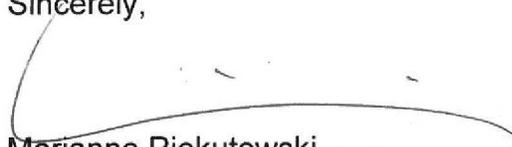
The renewal of the TOMP will be covered under separate correspondence.

Storm Water Permit

The Facility currently has coverage for its storm water under the general industrial storm water permit. On the day of the inspection, the roll-off box was tarped and under roof. The Facility renewed its coverage under the new multi-sector General Industrial Storm Water Permit. Currently, the Facility is trying to sample the stream for hardness data. The stream did not have enough flow to sample this summer. The subsector the Facility is covered under has benchmark sampling requirements with hardness dependent data.

The assistance you 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/tb

Enclosures

ec: Ryan Laake, DSW/CO
Dave Klump, Ripley



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
1DP00017*FP	OHP000117	12/12/2012	I	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
PCP Champion/Surgical Appliances 1311 East Second Street Ripley, Ohio 45167	11:25 am	01/01/2013
	Exit Time	Permit Expiration Date
	1:40 pm	12/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Tim Scott, Plant Manager	937.392.4301	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Village of Ripley WWTP	40 CFR 433.15	

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
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 12/18/12	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 12/18/12

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

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:

See attached diagram.

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

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

If yes, was a PTI obtained? 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 will batch treat when needed.

17. Who is responsible for operating the treatment system?
Tim Scott

18. How often is the treatment system checked?

Every two hours at a minimum.

WASTEWATER TREATMENT CONTINUED

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

There are pH and level alarms on the system.

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

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

pH meters, pH probes, bisulfide probe, diaphragms for pumps, extra switches.

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

Have bypasses occurred since the last inspection? Y / N

Was the POTW notified? Y / N

23. Are residuals or sludges generated? Y / N

Method of disposal:

The filter cake is landfilled.

Frequency and amount of disposal:

The roll-off box was hauled off-site on August 22, 2007, and replaced. It took approximately 6 years to fill the roll-off container. The facility is using the same box as last year.

Name of hauler/landfill/disposal facility:

Onyx hauls the roll-off to Envirosafe.

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

If land applying sludge, is there a sludge management plan? 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
<i>Nickel-Chrome Line</i>	<i>End-of-Process</i>		2,850		
Total Regulated Process Flow			2,850		
Non-Contact Cooling			3,250		
Blowdown			-		
Reverse Osmosis			-		
Demineralizer Regeneration			-		
Filter Backwash			-		
Compressor Condensate			-		
Storm Water			-		
Other Dilute Flows			-		
Unregulated Flows (provide list)			-		
Sanitary			1,000		
TOTAL FLOW			7,100		

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

None. Only the storm water doesn't go to the POTW. The facility has received coverage under the general industrial storm water permit.

SELF MONITORING

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

Samples shall be collected from the manhole immediately downstream from the wastewater treatment system in the storage room west of the plating and wastewater treatment room.

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

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:

The use of the water meter readings and flow restrictors (2.5 gpm). Since the chrome line is not being used as frequently, the rinses are being operated as stagnant rinses. These are then used to make up the chrome tank.

30. Is pH monitored continuously? Y / N
If yes, how often is the meter calibrated?
This is done daily.

31. Does the facility collect its own samples? Y / N
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y / N
Monitoring frequencies Y / N
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N
Flow proportioned samples **Grab sample taken every two hours.** Y / N
Proper preservation techniques Y / N
Sample holding times Y / N
Chain-of-custody forms Y / N

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

34. Laboratory conducting analyses:

Belmont Park. The facility will split samples with the Village. The Village uses MASI for its samples.

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? It was resubmitted with renewal application. Needs letter from Ohio EPA. 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

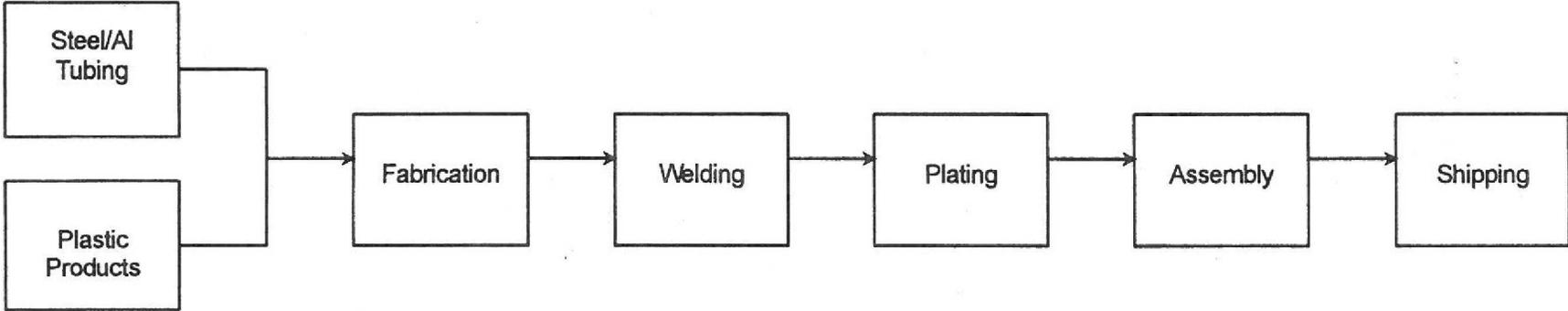
38. Does the facility need a spill prevention plan or slug discharge control plan? Y/N
If yes, does the facility have a written plan? Y/N

39. Identify any potential slug load or spill areas:

All of the chemical storage areas have trench drains that go to the pretreatment system. All of the wastewater must be pumped in order to reach the sewer.

REQUIRED FOLLOW-UP ACTIONS

PCP - Champion Process Schematic



Pretreatment Schematic

