



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

January 14, 2013

RE: KEN FORGING JEFFERSON PLANT
OHIO EPA PERMIT 3IS00121
JEFFERSON TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Kenneth A. Powell, Maintenance Supervisor
Ken Forging Inc.
1049 Griggs Road
Jefferson, OH 44047

Dear Mr. Powell:

On January 10, 2013, a site inspection was conducted at the above referenced facility at 1049 Griggs Road, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office with you and Mr. Carl May representing Ken Forging during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on August 15, 2012.

There are no floor drains within the manufacturing building. Industrial process wastewater is limited to waters collected from outside sealed dumpsters discharged to storm water ditches at the perimeter of the facility. Wastewater flows to the package plant is limited to domestic sewage from employee restrooms.

Observations

The following observations were made during the inspection:

1. The trash trap was cleaned on September 20, 2012. No sludge was removed from the facility in 2012.
2. The flow equalization pumps and alarms were cycled and found in operating condition.
3. The aeration tank contents had a chocolate brown colored sludge that is well aerated with no foaming. Blowers and alarms were cycled and found in operating condition. The plant was observed in good working order.
4. The log book, copy of the contract, copy of the NPDES permit, and O & M manual are maintained at the facility and were available for inspection. The information was found compliance with OAC 3745-7-09. Steve Howe, Charles Newman, and Daniel Velisek of AKE Environmental are listed as official Operators of Record (ORCs), as well as Ken Powell an, Carl May, and George Burgard of Ken Forging. Ken Forging personnel and the AKE perform routine operations at the WWTP monitors the facility, and performs the sampling. AKE submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based

application on behalf of Ken Forging. AKE visits the plant once weekly under contract, with Ken Forging operators performing most day-to-day operations at the facility.

5. The influent pump station and equalization tank pumps and alarms were cycled and found in operating condition.
6. The blowers and alarms were cycled and found in operating condition. The air line leak noted in the 2012 inspection has been repaired and air distribution is even across the tank. The contents of the tank were noted as a medium brown, with no odor. The return sludge lines were noted as operational.
7. Clarifiers were observed as somewhat cloudy, with some pin floc noted. The skimmer and return sludge lines were observed in operational condition. As noted above, sludge was not removed in 2012. Sludge should be removed from the system based upon sludge blanket depths and settleability of the mixed liquor. Sludge should be wasted from the system periodically to ensure a healthy biological community, and to remove accumulated grease and scum from the clarifier and trash traps.
8. The surface sand filter dosing pumps and alarms were cycled and found in operating condition.
9. The north sand bed was in use while the south bed was drying out. The wastewater entering the sand filters was observed as turbid. The sand filters were raked and free of any debris, and had sidewall joints sealed. Water could not freely percolate through the filters due to freezing weather. Some sludge was noted on the south sand bed that must be removed prior placing the bed back into service.
10. The chlorine contact tank and dechlorination system were not checked, as it is outside the disinfection season.
11. The final discharge to the pond was found to be discharging clear. The final outfall was observed as clear and of acceptable visual quality.
12. No evidence of discharges was noted from the exterior double walled tanks or from the roll-off box storage area.
13. Storm water discharge point to perimeter ditches at the facility was observed as clear.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2012 through December 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Effluent Limit Violations

The following effluent limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.79	8/1/2012

Ohio EPA notes that the Ken Forging remains in **significant noncompliance** for nitrogen ammonia. A written explanation as to why the exceedence event occurred was provided on September 25, 2012, and that it was still being investigated. As long as no additional ammonia-nitrogen violations occur, no additional information is needed at this time.

Frequency Violations

Although no specific reporting frequency violations were noted, Ohio EPA does note that the improper "A" code was reported in the eDMR for weekends and holidays in July 2012. The eDMR is reporting the code "AH" and providing an explanation when the code "AN" should be reported for weekends and holidays when the plant is not normally staffed for daily readings of flow rate, odor, color, and turbidity. The July 2012 eDMR remains not updated. Please revise the eDMR report accordingly.

Compliance Schedule

Ohio EPA notes that the current NPDES permit does not contain a compliance schedule.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Dan Kopec, Ohio EPA, DSW, CO
Steve Howe, Ake Environmental

File: Industrial/Ken Forging Inc./pc