



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

Re: **Notice of Violation**  
Wood County  
Willard Kelsey  
Pretreatment

March 29, 2013

Ms. Gina Kagy  
Environmental Health & Safety Manager  
Willard Kelsey Solar Group  
1775 Progress Drive  
Perrysburg, Ohio 43551

Dear Ms. Kagy:

On March 14, 2013, I conducted a pretreatment compliance inspection of the Willard Kelsey Solar Group manufacturing facility in Perrysburg, Ohio. The inspection consisted of a tour of the facility and questions from an inspection checklist.

Ohio EPA issued an Indirect Discharge Permit (IDP) to Willard Kelsey to discharge waste water to the City of Perrysburg sanitary sewers in March 2010. Willard Kelsey is a new solar panel manufacturer of photovoltaic panels for residential and commercial use. Currently, Willard Kelsey does not produce solar panels but generates waste water from research and development. Waste water from the cleaning and washing of the glass plates is collected in 500 gallon tanks and is batch discharged when enough of the waste water has accumulated.

The terms and condition of the discharge permit require Willard Kelsey to report monitoring data semi-annually no later than January 20 and July 20 of each year for the previous six months. The reports are to be submitted electronically through Ohio EPA's ebusiness center at <http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>. You may wish to check this website for information on how to obtain an account, a PIN, and submit the discharge monitoring reports. If you have any questions, you may wish to submit them by email to [James.Roberts@epa.ohio.gov](mailto:James.Roberts@epa.ohio.gov) for assistance.

Ms. Gina Kagy  
March 29, 2013  
Page Two

A search of our data shows that monthly reports were made for the months of July through December 2011. You had several recent changes in personnel and no discharge reports were made for 2012. This is a violation of the IDP. Even if there is no discharge, you must still submit a report that there was no discharge by using the code "AL" in the first data space of the discharge report for each month that there is no discharge or click the no discharge button in the eDMR system.

Our inspection form is enclosed. If you have any questions, you may contact me at (419) 373-3016 or by email at [patricia.tebbe@epa.oh.gov](mailto:patricia.tebbe@epa.oh.gov).

Sincerely,



Patricia A. Tebbe, P.E.  
Division of Surface Water

/jlm

Enclosures

pc: Rick Schmeltz, City of Perrysburg WWTP

ec: Ryan Laake, DSW-CO  
Tracking

# INDUSTRIAL USER INSPECTION CHECKLIST

Facility: Willard Kelsey

OH Number: OHP000240

Facility Representative(s): Gina Kagy

Date of inspection: 3/14/13

IDP Number: 2DP00086\*AP

Inspector(s): Patricia Tebbe

## COMPLIANCE

1. Date of last pretreatment inspection: N/A

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
		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
--	--	---

Explain any unresolved actions: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 12

7. Production Days/Year: 200

6. 1 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: Willard and Kelsey coats glass panels to be used in the solar energy industry. The panels are wash/rinsed between coatings \_\_\_\_\_

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

If yes, explain: \_\_\_\_\_  
\_\_\_\_\_

	X
--	---

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

If yes, explain: \_\_\_\_\_  
\_\_\_\_\_

	X
--	---

---

### WASTEWATER TREATMENT

---

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

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:

710668

Date: 10/2/09

Yes	No
X	
X	
	X

Batch	Continuous	Combination
X		

16. What is the treatment mode of operation?

If batch, list the frequency and duration: as needed:

17. Who is responsible for operating the treatment system? Gina Kagy

18. How often is the treatment system checked? as needed

Yes	No	N/A
	X	

19. Is there an alarm system for the system?

Explain: system only used when operator is present

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?

	X	
--	---	--

If yes, describe the location: \_\_\_\_\_

Have bypasses occurred since the last inspection?

	X	

Was the POTW notified?

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?

	X	

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

**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
500 gallon batch tanks	At tank				
<b>Total Regulated Process Flow</b>					
<b>Noncontact Cooling</b>					
<b>Blowdown</b>					
<b>Reverse Osmosis</b>					
<b>Demineralizer Regeneration</b>					
<b>Filter Backwash</b>					
<b>Compressor Condensate</b>					
<b>Storm water</b>					
<b>Other Dilute Flows</b>					
<b>Unregulated Flows(provide list)</b>					
<b>Sanitary</b>					
<b>TOTAL FLOW</b>					

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: \_\_\_\_\_

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? \_\_\_\_\_

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: \_\_\_\_\_

X	
---	--

32. 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	

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

34. Laboratory conducting analyses: \_\_ Jones & Henry Northwood,  
OH \_\_\_\_\_

\_\_\_\_\_

---

**TOXICS MANAGEMENT**

---

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

If yes, identify organics: \_\_\_\_\_

Yes	No
	X

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

If yes, is it being implemented?

	X

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

If yes, please explain: \_\_\_\_\_

	X
--	---

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

If yes, does the facility have a written plan?

	X

39. Identify any potential slug load or spill areas: \_\_\_\_\_

\_\_\_\_\_

---

**REQUIRED FOLLOW-UP ACTIONS**

---

Currently this facility is in R & D mode. Wastewater is collected in a batch tank and held until full. The resin units used for the treatment of the wastewater are not full scale and have been provided by IFM. Samples of wastewater are taken according to the IDP before discharge to the City of Perrysburg. Discharge is infrequent.

If/when Willard and Kelsey should decide to go into production mode, before that happens, they are to contact Ohio EPA NWDO for further assessment of their wastewater and permits to determine if any additional permits or changes to current permits will be necessary.



# PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY: Willard Kelsey Solar Group LLC	PERMIT #2DP00086*AP	FACILITY #OHP000240
INSPECTION TYPE: C	INSPECTOR: S	FACILITY TYPE: 2
		DATE CONDUCTED: 3/14/13

<b>GENERAL INFORMATION</b>
NAME AND LOCATION OF FACILITY: Willard Kelsey Solar Group LLC 1775 Progress Dr Perrysburg OH 43531
MAILING ADDRESS OF FACILITY: same
CONTACT (NAME/TITLE/PHONE): Gina Kagy Environmental Health & Safety Manager

<b>FACILITY EVALUATION</b>			
(S = Satisfactory, M = Marginal, U = Unsatisfactory)			
	S	Permit	
	S	Facility Site Review	
*	U	Records/Reports	
* See inspection letter			

Names(s) and Signature(s) of Inspector(s) <i>Patricia A. Tebbe</i> Patricia A. Tebbe, P.E.	Agency / Office / Telephone Ohio EPA 419-373-3016	Date 3/26/13
Signature of Reviewer <i>Thomas Poffenberger</i> Thomas Poffenberger, P.E.	Ohio EPA / NWDO / 419-373-3000	Date