



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

April 19, 2013

RE: TRUMBULL COUNTY  
WARREN  
SCHAEFER EQUIPMENT  
NPDES NO. 3IS00100

Schaefer Equipment  
1590 Phoenix Rd. NE  
Warren, OH 44483  
Attn: Marty Franko

Dear Mr. Franko:

On March 21, 2013, a pre-permit / compliance evaluation inspection (CEI) was conducted at Schaefer Equipment, 1590 Phoenix Road, NE, in Warren. Present during the inspection were you, representing Schaefer Equipment, and Mr. Jon Jamison and this writer, of the Ohio EPA.

The purpose of the March 21st inspection was to observe the sources of water being generated by current manufacturing at Schaefer Equipment; to observe the permitted outfall station as contained in the National Pollutant Discharge Elimination System (NPDES) permit for the facility; and to review the information contained within the NPDES individual permit renewal application as submitted by Schaefer Equipment in June 2011.

At the time of the March 21st inspection, the following observations were made, or items were discussed:

- 1) Schaefer Equipment is a manufacturer and supplier of carbon and alloy steel hammered and pressed forgings. The facility additionally includes a die shop and machine shop.
- 2) Non- contact water is used for cooling of 3 heat induction furnaces; 3 water cooled air compressors which run the forging equipment; and 2 sets of dies used in pressed forgings.
- 3) The water is used for cooling the above processes, and enters a pass through heat exchanger, with no chemicals added.
- 4) The cooling water enters collection drains, which carry the water to the 100,000 gallon capacity Cooling Water Pool, located outside the building. From the Cooling Water Pool the water is recycled, being pumped back through the cooling system again.
- 5) The cooling system is normally closed. However, when a precipitation event occurs, combined storm and cooling water can overflow from a catch basin by the Cooling Water Pool, and enter an 18" clay pipe. The 18" pipe directs overflow water through a grease/oil trap, prior to discharging to Schaefer Ditch.

- 6) Effluent water is sampled when discharge from the grease/oil trap occurs, which is only following a precipitation event.
- 7) Flow discharged from the grease/oil separator passes a Drexelbrook USonic-R ultrasonic flow meter. An ultrasonic flow meter and V notch weir is in place at end of the oil/water separator culvert box, prior to the water being discharged to the Schaefer Ditch.

Following the March 21st meeting, an inspection of the Schaefer Equipment manufacturing process, and non-contact cooling water was conducted.

A review of the compliance history for this facility, for the period of September 1, 2006 through April 1, 2013, was conducted utilizing data submitted in the electronic Discharge Monitoring Reports (eDMRs). The SWIMS data management tracking system found the following numeric effluent limits violations (based upon the data submitted to the Ohio EPA):

**Schaefer Equipment**  
**(Individual) NPDES No. 3IS00100**  
**(9/1/06 – 4/1/13)**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2007	004	Oil and Grease, Total	1D Conc	10	15.5	4/12/2007
May 2007	004	Oil and Grease, Total	1D Conc	10	11.6	5/16/2007
October 2009	004	Oil and Grease, Total	1D Conc	10	10.2	10/19/2009
April 2011	004	Oil and Grease, Total	1D Conc	10	11.	4/13/2011
October 2011	004	Oil and Grease, Total	1D Conc	10	15.3	10/3/2011

**Schaefer Equipment**  
**(General) NPDES No. 3GR00224**  
**(9/1/06 – 4/1/13)**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	004	Nitrite Plus Nitrate,	1D Conc	0.68	.748	7/5/2012
February 2013	004	Nitrite Plus Nitrate,	1D Conc	0.68	1.06	2/14/2013

Other items discussed during the March 21<sup>st</sup> inspection:

- 1) Effluent samples are collected by Mr. Franko, in bottles provided by Cardinal Labs. The bottles are provided with all necessary preservatives already in them.
- 2) The samples are picked up by the lab, and transported in iced containers back to the lab for analysis. A chain of custody form for tracking of the samples is employed by Schaefer Equipment and their analytical lab.

- 3) As a reminder, O&G samples are to be collected **directly** into a glass container, and sealed with a Teflon lined lid. The O&G sample should not be collected in one container, then transferred to another for analysis.
- 4) Present employment at the Schaefer Equipment facility is approximately 50 persons, 1 shift per day.
- 5) Sanitary wastewater generated at the facility is directed to the Warren WWTP for treatment.
- 6) You indicated that you sample the effluent from the end of the culvert box for aluminum, zinc, and nitrate-nitrite. When questioned why samples for those parameters were collected, you indicated the NPDES permit issued to Schaefer Equipment required the effluent be sampled for those parameters.
  - a. A review of the Individual NPDES permit (3IS00100\*ED) for the facility confirmed the fact that sampling for aluminum, zinc, and nitrate-nitrite was not required by the permit.
  - b. Upon further discussion, you indicated that the permit requiring the sampling was issued from Columbus.
  - c. A copy of the Columbus -issued NPDES permit approval was produced and examined. It was subsequently determined that Schaefer Equipment had been issued an Industrial Storm Water General NPDES permit (3GR00225\*EG) back in early 2012, replacing a prior Industrial Storm Water General NPDES permit they had been issued, which had expired on May 31, 2011.
- 7) Schaefer Equipment therefore had 2 NPDES permits to discharge, with only one being needed. Since the General Permit was just renewed and is effective until December 31, 2016, and the Individual permit has been in an expired mode since August 31, 2011, the Individual Permit will not be renewed for your facility.

Schaefer Equipment should continue with all efforts that will enable its facility to consistently meet its NPDES permit limits.

If there are any comments or questions concerning this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen  
Environmental Engineer  
Division of Surface Water

CEA/cs