



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

May 8, 2013

Mr. Doug Harrison, General Manager
Malt Products Corporation
4744 Wolfcreek Pike
Dayton, OH 45427-3336

**RE: Montgomery County, Malt Products Corporation
Compliance Evaluation Inspection and Notice of Violation**

Dear Mr. Harrison:

On April 22, 2013 I conducted a Compliance Evaluation Inspection at the Malt Products Corporation. The facility has obtained coverage under the general permit for "Non-Contact Cooling Water" (NPDES Permit No. OHN000004; OEPA Permit No. 1GN00011*CG) and the "Multi-Sector General Permit" for storm water (NPDES Permit No. OHR000005; OEPA Permit No. 1GR00471*EG). As part of the inspection process, a compliance evaluation was performed on the data submitted in monthly Discharge Monitoring Reports. No effluent limit violations were discovered for the period of time reviewed (January 1, 2012 to April 1, 2013 – see Attachment 1). A copy of the inspection reports has been included with this letter. This letter also serves as a Notice of Violation for failure to develop and implement a Storm Water Pollution Prevention Plan (SWP3) as required in Permit 1GR00471*EG.

Subsequent to the inspection, Mr. Bill Myers of Malt Product Corporation stated via email that the Storm Water Pollution Prevention Plan will be developed no later than September 1, 2013. A copy of the plan will need to be provided to this office within 2 weeks of completion.

During the inspection, it was discussed that the facility may be expanding its operations. I encourage you to review the applicability of the general storm water permit for "Construction Activities". I have included the following link which provides additional information regarding this permit:
http://epa.ohio.gov/dsw/permits/GP_ConstructionSiteStormWater.aspx .

Malt Products Corporation
Compliance Evaluation Inspection and Notice of Violation
May 8, 2013
Page 2

If you have any questions regarding this matter, please feel free to contact me at (937) 285-6107 or via email at: Robert.Ostendorf@epa.ohio.gov.

Sincerely,



Bob Ostendorf Jr.
Environmental Specialist II
Division of Surface Water

Enclosure(s)

BO/tb



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1GN00011*CG	OHN000004	04/22/13	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Malt Products Corporation 4744 Wolfcreek Pike Dayton, OH 45427	10:00	January 1, 2011
	Exit Time	Permit Expiration Date
	11:45	December 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bill Myers, IT and Quality Jim Lopresti, Maintenance Manager Doug Harrison, General Manager	937-276-7980	
Name, Address and Title of Responsible Official	Phone Number	
Doug Harrison General manager 4744 Wolfcreek Pike Dayton, OH 45427-3336	937-276-7980	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	M	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	N	Effluent/Receiving Waters	S	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments	
Inspector	Reviewer
 Bob Ostendorf Jr. Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
5-9-13 Date	5/9/13 Date

Summary of Findings / Comments

The facility was represented by Mr. Bill Meyers, Mr. Jim Lopresti and Mr. Doug Harrison. Mr. Harrison did not take part in the facility tour. During the inspection, it was confirmed that Table 3 is the applicable table in NPDES Permit 1GN00011*CG. It was determined that the source water for the non-contact cooling water is ground water. The facility was made aware of the priority pollutant scan and metals monitoring requirements found in Part II Item B of the NPDES permit. It was confirmed that the discharge is from a single pass-through heat exchanger with no chemical additions.

During the inspection, the sampling and analysis performed by the facility was discussed. The discussion revealed that the pH result was being rounded to a whole number. The facility was advised that the pH result should be reported to the tenths position. It was determined that the thermometer used for monitoring the temperature of the effluent reads in increments of 1°. The facility was advised that the thermometer would need to be NIST traceable or calibrated with an NIST traceable thermometer and would need to read in increments of 0.5°. A copy of the General Lab Criteria was provided to the company for their use.

During the inspection, it was noted that a section of the bank adjacent to the rail spur was bare and void of vegetation. The possibility of a broken steam line, which may have discharge excessively hot water, was discussed during the inspection. Mr. Myers and Mr. Lopresti were not aware of any incident which may have caused the bare area. The facility was advised to provide vegetation for the area to minimize erosion.

ATTACHMENT 1 EFFLUENT LIMIT VIOLATIONS (Period of Review: January 1, 2012 – April 1, 2013)

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
No violations discovered for the period of time reviewed.					

Industrial Storm Water
Compliance Evaluation Inspection

Name of facility; Malt Products Corporation
Address; 4744 Wolfcreek Pike
Dayton, OH 45427

Permit number; 1GR00471*EG

Applicable permit sector; U – Food and Kindred Products

Date of visit; 4/22/12 Time started; 10:00 a.m. Time ended; 11:45 a.m.

Facility representative(s); Mr. Bill Myers – IT and Quality
Mr. Jim Lopresti – Maintenance Manager
Mr. Doug Harrison – General Manager

OEPA inspector; Bob Ostendorf Jr.

SWP3:

- A. Did the facility representative produce an SWP3? **Y / N / Not requested**
- A1. Did it include a site map? **Y / N**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y / N**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y / N**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? **Y / N**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **Y / N / NA**

Comments;

The facility does not have an SWP3 (Storm Water Pollution Prevention Plan).

Inspection records:

- B. Were inspection records available? **Y / N**

Comments:

The facility has performed routine inspections of outside storage areas.

Site Observations:

- C. Are materials stored exposed to weather? **Y / N.**
If Yes, list materials.

Industrial Storm Water
Compliance Evaluation Inspection

Trash – stored in a compactor.

Scrap Metal – stored outside and exposed to the elements.

- D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens . **Y / N / Not sure**

The facility has a normally dry detention pond. The detention pond has vegetation established with the exception of a bare area adjacent to the rail spur.

- E. Number of outfalls from site/number inspected: 1 / 1

- G. Did any show evidence of pollutants discharged in the storm water? **Y / N**

If yes, describe; See "D" above.

- H. Other observations/comments;

The following observations were made during the inspection and will need to be addressed by the facility:

1. The facility does not have an SWP3 developed . Subsequent to the inspection the facility stated that it anticipated completing the SWP3 by no later than September 1, 2013.
2. The facility will need to provide vegetation for the bare area adjacent to the rail spur.