



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

June 19, 2013

Mr. Jim Spurlock
Schneider Electric North American Division
5735 College Corner Road
Oxford, Ohio 45056

**RE: Schneider Electric/Square D, Oxford, IU Inspection
Notice of Violation**

Dear Mr. Spurlock:

On June 5, 2013, I conducted the annual industrial user (IU) inspection at the Schneider Electric facility in Oxford. You represented the facility. The facility is considered to be a significant industrial user (SIU) because there are the powder coat lines that are considered to be metal finishing operations. These operations are regulated under the Metal Finishing Categorical Standard, 40 CFR 433.17. The inspection covered the receiving area for raw materials, the machining and assembly areas, the two powder coat lines, and the wastewater treatment area with the sampling location.

The facility has submitted its self-monitoring reports for 2011 and 2012. One sampling event has been submitted for the first half of 2013. The complete report is due July 20, 2013. All of the required sampling events for 2011 were completed. For 2012, only two of the required six samples were submitted. These are considered frequency violations. This report will serve as the Notice of Violation for these frequency violations. The facility will receive an overall rating of marginal.

Brief Description of Facility

Schneider Electric manufactures electrical distribution equipment including bus duct and wireway products. The facility machines, coats and assembles the raw materials for use in industrial applications.

Regulated Flows and Pretreatment

Schneider generates regulated flow associated with the coating of parts. At the present time, there are two regulated sources. These are the two powder coat lines. The powder coat line is used to provide insulating properties to bars that will be used in busways for outdoor applications. The parts pass through an alkaline cleaner and an iron phosphate bath plus the associated rinses prior to being powder coated. The alkaline and iron

Mr. Jim Spurlock
Schneider Electric North American Division
June 19, 2013
Page 2

phosphate tanks are heated with a closed loop heat exchanger. The parts then pass through the powder coat and into an oven for curing. The powder coat line has replaced the e-coat line, and eliminated the paint booth for custom colors. Custom colors can be placed directly over the normal gray color using the powder.

Each of the phosphating lines have a waste treatment system associated with them. These systems are used for pH neutralization. In addition, the wastewaters that are generated on-site are treated as described in previous inspections (report dated July 26, 2004). Production now runs one ten hour shift, four days a week. Employees have been working consistent overtime during the past year.

The facility is using its reverse osmosis (RO) system for its clean process water. The deionized water with a resin that was regenerated using acid and caustic has been removed, and reduced the risk associated with having the acid and caustic totes up on a mezzanine platform. The pH neutralization for this discharge is no longer needed. The RO reject water does not require any treatment.

With the iron phosphating and reverse osmosis installations, the facility no longer needs to treat its wastewater to meet its permit limits. The wastewater flows into the mix tank, and is then discharged to the sewer system directly from the mix tank.

Schneider is now recycling the waste powder coat, Mylar™, and Lexan™. These materials are now being recycled through EnviroEnterprises. The facility is still working toward a zero-landfill operation. The facility keeps approximately 95.9% of the waste from landfill through recycling. The cafeteria operations have changed since last year's inspection. There is no longer any cooking being done on-site so the organic waste associated with this has been eliminated. There is an internal team working towards this goal. The facility is recycling its Lexan.

The area where the old e-coat system was located has converted into warehouse space. The sumps, etc, in the area have been filled in, and storage shelving was installed in this area. There is no wastewater associated with this area.

Sampling

The facility is sampling at Tank 5 Mix Tank. The sampling location is representative. All the treatment equipment has been removed. Test America is the contract laboratory for the facility.

The indirect discharge permit was renewed since the last inspection. The sampling location was changed to reflect the changes in the pretreatment equipment. The current permit was effective on January 1, 2013, and expires on December 31, 2017.

Mr. Jim Spurlock
Schneider Electric North American Division
June 19, 2013
Page 3

The assistance provided was appreciated. Should you have any questions regarding this report, feel free to contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

MP/kb

Enclosures

cc: Ryan Laake, DSW/CO
Jeff Ratliff, Oxford



State of Ohio Environmental Protection Agency
Southwest District Office

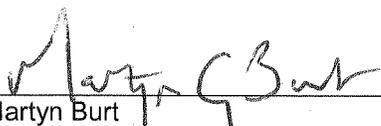
Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00031*CP	OHP000138	06/05/2013	I	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Schneider Electric North America Division 5735 College Corner Road Oxford, Ohio 45056		11:00 am	01/01/2013
		Exit Time	Permit Expiration Date
		1:45 pm	12/31/2017
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Jim Spurlock, Safety & Environmental Manager		(513) 664-4100	
POTW Receiving Discharge		Categorical Standard(s) or Other Classification	
City of Oxford WWTP		40 CFR 433.17	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
M	Pretreatment		

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	

Inspector	Reviewer
 Date: 6/19/13	 Date: 6/19/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

INDUSTRIAL USER INSPECTION CHECKLIST

Facility **Schneider Electric Square D Co.**

Date of inspection: **June 5, 2013**

OH Number: **OHP000138**

IDP Number: **1DP00031*CP**

Facility Representative: **Jim Spurlock**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **July 30, 2012**

2. Has the facility been in compliance with its permit limits since the last inspection? Y/N
If no, explain:

The eDMRs were submitted. From the information provided, all of the samples for 2011 were collected. Two of the six samples required for 2012 were collected. The samples for the first half of 2013 are due July 20, 2013.

3. Is the facility in compliance with all other requirements?
Sampling procedures Y/N/NA
Reporting (late reporting, failure to report, etc) Y/N/NA
Compliance schedules Y/N/NA
Submitted BMR and 90 day compliance reports Y/N/NA
Any other requirements Y/N/NA

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? Y/N
Explain any unresolved actions:

The on-going issues related to submittal of the eDMRs.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **275**

6. Shifts/Day: **1**

7. Production Days/Year: **312**

8. Hours/shift: **10 & 8**

9. Any production changes since the last inspection? Y/N
If yes, explain:

- The facility runs production four ten hour days. Office staff are there for five eight-hour days. The facility has been working overtime.

10. General facility description and operations:

Manufacture electrical distribution products.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

Copper
Aluminum
Steel

EnviroEnterprises is taking the mylar, lexan and waste powder coat for recycling. The facility is trying to reduce the amount of waste going to the landfill. Eventually, they would like to be a zero-landfill facility. The facility is close to being a zero landfill facility (95.9% recycled). The waste from the cafeteria noted in last year's report is down. The facility is no longer cooking on-site.

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 schematics. The facility has eliminated its metals removal system since there is only iron phoshating occurring. With the installation of the RO system, the need for pH adjustment has also been eliminated. There are only 5 gallon/quarter of sulfuric acid on-site for use in the boiler room.

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? **Removed metal treatment system since no longer need.** Y/N

PTI Number: **611922**

Date: **June 13, 2007**

16. What is the treatment mode of operation? Batch / Continuous / Combination

If batch, list the frequency and duration:

The tanks is filled on a continuous basis, but it is released on a batch basis. A batch is released approximately once a day.

17. Who is responsible for operating the treatment system?
Bill Johnson, John Wittwer

18. How often is the treatment system checked?

The pH of each batch is tested prior to discharge. A continuous pH meter was installed in mid-April 2010.

WASTEWATER TREATMENT CONTINUED

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

pH alarms, level alarms. If the pH is out of range, then the system is shutdown

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

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

Pump parts.

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:

Rumpke Landfill

Frequency and amount of disposal:

Approximately 200#/month or less. The sludge press was replaced with a smaller press. Tanks solids are removed from the tanks at the lines.

Name of hauler/landfill/disposal facility:

Rumpke Waste

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

The facility does an annual TCLP. No change. Not hazardous.

If land applying sludge, is there a sludge management plan? **NA** 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
Powder Coat	<i>End of Process</i>		4,000		
Total Regulated Process Flow			4,000		
Non-Contact Cooling			800		-The RO unit only discharges when on. Controlled by a float valve. Discharge once a shift. - Non-contact cooling water blowdown based on conductivity. - Boiler blowdown is closed loop to air handler. The flow is the volume in the boiler loop/HVAC.
Blowdown			5,000 <i>week or month</i>		
Reverse Osmosis			3500		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW			5,500 gpd		

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

The storm flow from the facility flows overland into Elams Run. The facility has coverage under the general industrial storm water permit.

SELF MONITORING

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

The samples are collected from the Tank 5 Mix tank.

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?

There is a known volume in the tank. Water meter readings are also used as a backup to the volume of the tank.

If estimated, describe method of estimation:

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

The probes are calibrated monthly. A two point (4 & 10) calibration done. Twice a year an outside service calibrates.

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 ***Time composited.*** 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:

Test America. The bottles are received from the lab preserved.

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / N
If yes, identify organics:

Clean up solvent (glycol ether) usage has been reduced 27%. Safety Kleen maintains these stations. They use mineral spirits. The rags that are used with solvent are collected by Safety Kleen. Most of the mineral spirits usage has been cut. There is one tank left in the tool room. They have been replaced with a water-based material which uses an enzyme. The usage for this is about 100 gallons per year.

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

If yes, is it being implemented? 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

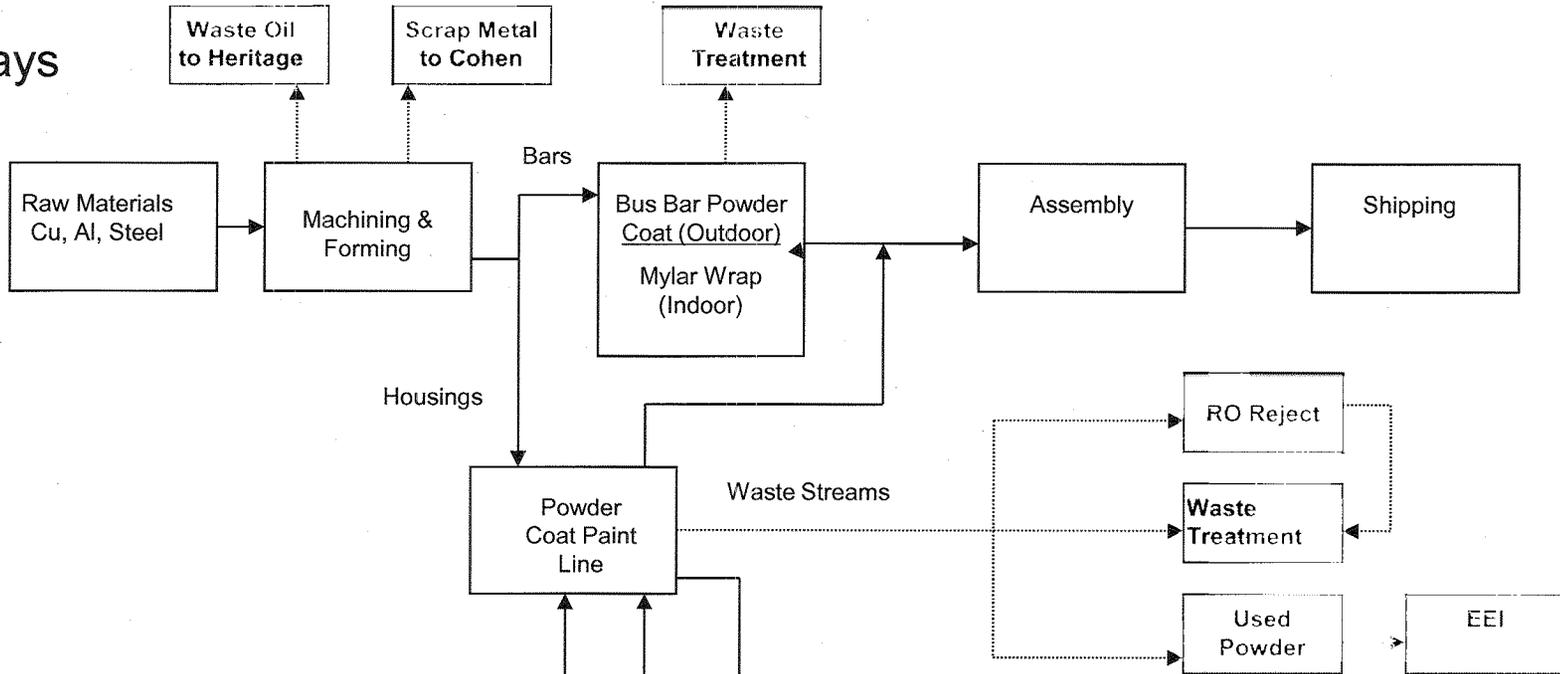
39. Identify any potential slug load or spill areas:

The facility has an SPCC for its fuel oil storage.

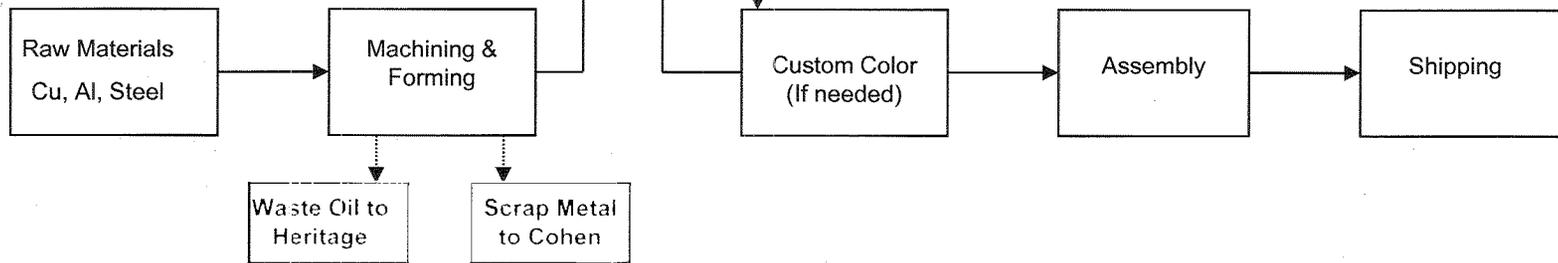
REQUIRED FOLLOW-UP ACTIONS

Process Schematic – Schneider Electric

Busways

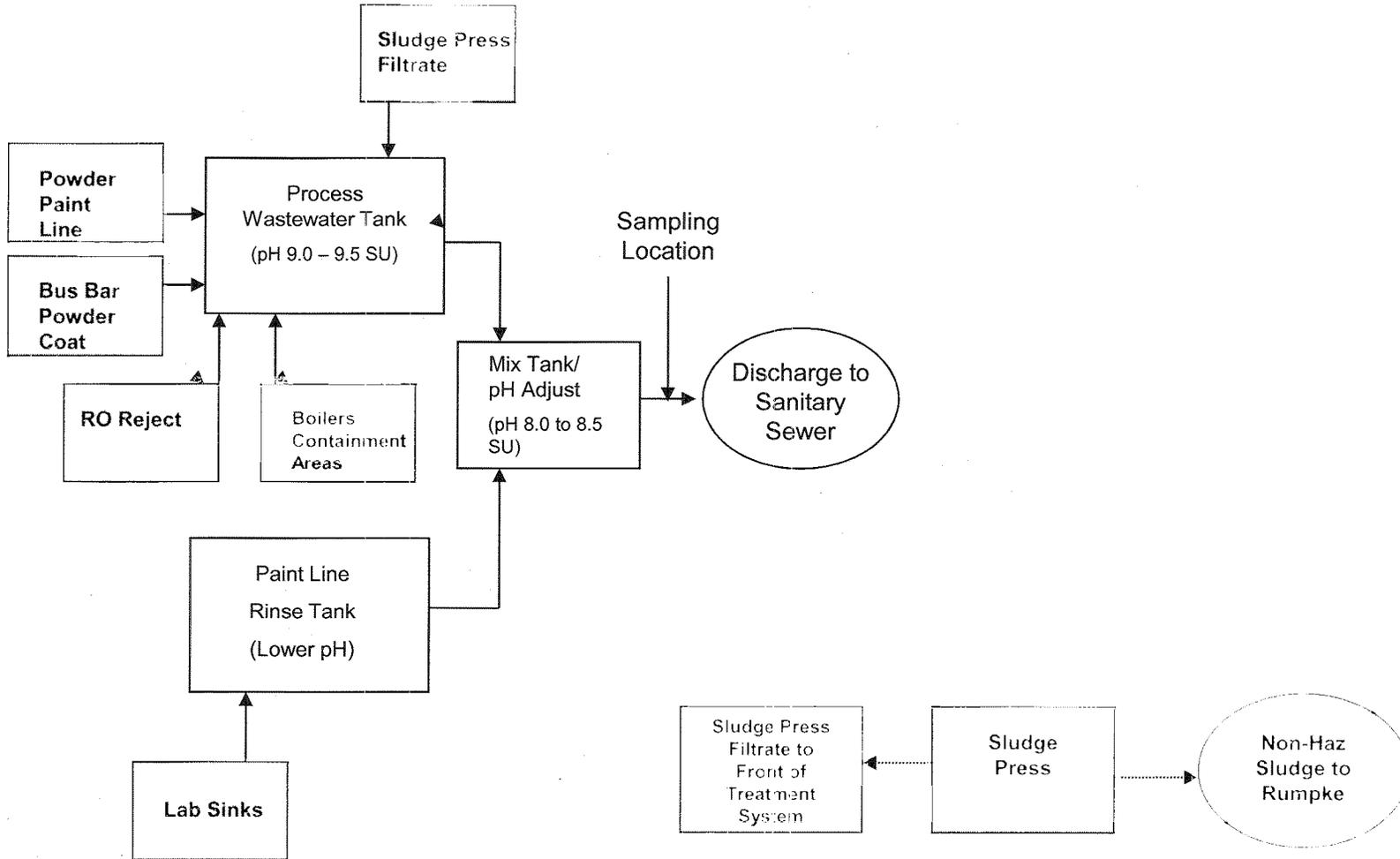


Fuse, Switch Boxes, Etc.



July 8, 2011

Pretreatment Schematic Schneider Electric



August 28, 2012