Ohio EPA
40 years and moving forward

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

August 8, 2013

Mr. Iwan Gibby
American Showa, Inc. Blanchester Plant
960 Cherry Street
Blanchester, Ohio 45107

RE: American Showa, Inc., Blanchester, Annual Inspection, 2013
Notice of Violation & Significant Non-Compliance Determination

Dear Mr. Gibby:

On July 16, 2013, I conducted the annual pretreatment inspection at your facility. Chris Boise and Loren Ocull represented the facility. The facility is considered to be a significant industrial user (SIU) under Ohio Administrative Code (OAC) 3745-36-02(U)(2) which states, " Any other user that:....is designated as such by the director on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating and pretreatment standard or requirement." The inspection covered the casting areas, machining and assembly area, the pretreatment system, and the clean room.

The facility had Oil and Grease violations of its discharge permit since the last inspection. Because of these violations, the facility was in significant non-compliance (SNC) for the second half of 2012. The facility returned to compliance in February 2013. The SNC has been resolved. Showa has shifted the type of power steering unit being manufactured on-site. Instead of the rack and pinion power steering units, there will be electric power steering units manufactured. The facility will begin to manufacture CVT transmission pumps. Currently, the site is transitioning into this. The processes are similar, and should not significantly change the discharge. American Showa Blanchester will receive an overall rating of marginal because of the Oil & Grease violation.

Brief Description of Facility

American Showa, Inc. (ASI) manufactures steering components and pumps. Parts are supplied to Honda, Subaru, and Mazda. As part of the manufacturing process, casting, machining, and assembly work are done.

Process Discharges and Pretreatment

The old equipment associated with the rack and pinion steering has been removed. The number of casting lines operations were down. All of the casting machines at the facility are on a chiller cooling system. The chiller system does not have a discharge to the village of Blanchester. The water from this closed loop system is disposed of off-site by Ultra. The quench water is also being disposed of off-site.

Showa is transitioning into manufacturing a CVT transmission pump. The pumps will be made of steel and an aluminum casing. The areas where machines were removed are being prepared for new equipment to come into the facility. The wastewater characteristics should not change. This should be finished for the 2015 model year. The mass production should ramp up at the end of 2014.

Storage Area

The used oils/coolants are recycled on-site at the facility. There are two separate systems for the two products used in machining. The system uses stainless steel tanks for this. The tanks are contained within a diked spill containment area. A new centrifuge was installed for the oil recycling. It is owned, operated and maintained by a third party.

There are two separate roll-off boxes for the steel and aluminum scrap. These roll-off boxes are covered. The sumps that collect the waste coolant from the material are pumped back into a sump in the building for recycling. The aluminum scrap is taken by Quantum for recycling. The steel and dross from the casting process is stored in metal bins at the far end of the machining area. This material is taken off-site by Sims.

Sampling

The facility is sampling as required. The facility is sampling in the fire pit prior to entering the Village's collection system. The following violations were noted since the last inspection:

Outfall 1DP00000001

The following code violations were noted:

Parameter	***Date***	***Code***
Flow (00056)	09/17/12	AB
Flow (00056)	09/27/12	AB
Flow (00056)	10/11/12	AB
Flow (00056)	11/08/12	AB
Flow (00056)	11/19/12	AB
Flow (00056)	11/27/12	AB
Flow (00056)	11/28/12	AB
Flow (00056)	12/13/12	AB

An explanation of why the data was lost should be provided.

Parameter	*Code*	*Date*	*Reported*	*Units*	*Permit Limit*
Oil & Grease	00552	09/17/12	51.4	mg/L	50 mg/L (D)
Oil & Grease	00552	11/08/12	174.3	mg/L	50 mg/L (D)
Oil & Grease	00552	11/19/12	138.6	mg/L	50 mg/L (D)
Oil & Grease	00552	11/27/12	112.4	mg/L	50 mg/L (D)
Oil & Grease	00552	11/28/12	214.6	mg/L	50 mg/L (D)

In addition, the facility failed to notify Ohio EPA within twenty-four hours of becoming aware of the violation. Please note, in the event of a permit violation, Ohio EPA must be notified within twenty-four hours. Because more than 33% of the violations exceeded the Technical Review Criteria (TRC) of 70 mg/L in the second half of 2012, the facility was in significant non-compliance (SNC) of Oil and Grease. This report will serve as the Notice of Violation (NOV). Please be advised, in the future, failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Facility returned to compliance in the first half of 2013.

The assistance provided by your staff was appreciated. Should you have any additional questions, feel free to contact me at (937) 285-6108.

Sincerely,

Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

MP/kb

Enclosures

cc: Chris Boise, ASI
Ken Wilson, Blanchester
Ryan Laake, DSW/CO

OhioEPA

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
1DP00000*EP	OHP000006	07/16/2013	I	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
American Showa, Inc. Blanchester Plant 960 Cherry Street Blanchester, Ohio 45107	10:00 am	03/01/2010
	Exit Time	**Permit Expiration Date**
	12:25 pm	02/28/2015

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Chris Boise Loren Ocull	(937) 783-1666

POTW Receiving Discharge	Categorical Standard(s) or Other Classifcation
Village of Blanchester WWTP	Potential to Adversely Impact the POTW

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
8/8/13	8/8/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Date Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
	Date

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***American Showa, Inc.*** Date of inspection: ***July 16, 2013***

OH Number: ***OHP000006*** IDP Number: ***1DP00000*EP***

Facility Representative: ***Chris Boise, Loren Ocull*** Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***July 31, 2012***

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

Since September 2012, there have been 6 Oil & Grease violations. The facility was in significant non-compliance for the second half of 2012, but has returned to compliance in February 2013. When there is a violation in the self-monitoring, the facility is required to report this to Ohio EPA within 24 hours of becoming aware of the violation. This was not being done. In addition, there were 8 code violations. These are noted in the cover letter.

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:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***430*** 6. Shifts/Day: ***3***

7. Production Days/Year: ***250 (5 day work week)*** 8. Hours/shift: ***8***

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

The new electric power steering is running in mass production now. There is less production for maching and casting. The facility is in the process of transitioning into the manufacturing of CVT (transmission) pump. These parts are similar to work done at the facility. Will be done for the 2015 model year (later in 2014). These will be aluminum housings with steel parts.

10. General facility description and operations:

Produce power steering components, gear boxes and pumps for automobiles. Die casting, machining and assembly are the primary manufacturing operations.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

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

12. Any expansion or production increase expected within the next year? ~~Y~~ / **N**
If yes, explain:

There will be a replacing of past work, but no big increases expected. Staffing levels expected to remain in the 430 range.

WASTEWATER TREATMENT

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

Oil skimming, polymer addition, gravity separation.

See attached schematic.

Clay polymer is in use. The two oil skimmers are being used on existing tanks. There is only a small amount of flow (coolant) associated with the Power Steering Manufacturing. This is usually recycled. If the centrifuge is down, then this would go to waste treatment.

Normally recycle the coolants with the centrifuge, then it goes back out for use in the lines. The used oil is sent out and refined. The water and fines are removed, and the oils are sold as fuel. Future Environmental takes the oils. Ultra Environmental takes the wastewater from casting.

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? ~~Y~~ / ~~N~~

PTI Number: ***NA*** Date: ***NA***

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

If batch, list the frequency and duration:
Wastewater is generated 24 hours a day, but treatment occurs for 8 hours a day on third shift (6:30 am to 3:00 pm). The separation system operates on a continuous basis during this time. The clay/polymer system operates in batches during third shift.

17. Who is responsible for operating the treatment system?
Loren Ocull

18. How often is the treatment system checked?

Hourly. Check the pit during shift to ensure that it doesn't overflow.

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

High level alarms on sumps and tanks.

20. Is there an operations and maintenance manual? ***There is one for the clay/polymer system.*** ~~Y~~ / N

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

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:
Recycle aluminum and steel turnings from machining operations.
Recycle metal sludge from machining coolant.
Waste oil to used oil tank (recycled).

Frequency and amount of disposal:
Machine Turnings: Unknown
Metal Sludge from Coolant: Unknown
Waste Oil: ~2000 gallons per month

Name of hauler/landfill/disposal facility:
Aluminum goes to Quantum.
Oil goes to Future Environmental.
Coolant sludge goes to Republic.
Nitol (isopropanol/acid material) used for surface testing. Taken by Clean Harbors.
Dross and steel goes to Sims for pickup.
Sand cores and solid waste are taken by Republic.

Is any sludge generated subject to RCRA regulations? Y /N
The caustic soda associated with casting is no longer being used. The facility is a conditionally exempt hazardous waste generator. Did not ship out any hazardous waste since the last inspection.

If land applying sludge, is there a sludge management plan? ~~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
Cast Quenching		*288*	*(1)*		
Heat Treat Quench		*NA*	*0*	*NA*	*NA*
Total Regulated Process Flow		*0*	*0*		
Unregulated Processes					
Cart & Floor Washing	*End-of-Pipe*	*1,400(2)*	*1,400(2)*		
Parts Washing	*End-of-Pipe*	*520(2)*	1,730(3)		
Machining Coolant (recycle 8,000 gal/mo coolant)	*End-of-Pipe*	*390(2)*	*390(2)*		
Total Unregulated Process Flow		*2,310(4)*	*2,310(4)*		
Non-Contact Cooling		Not factored into permit limits	*(5)*		
Blowdown		--	--		
Reverse Osmosis	*Closed system.*	Not factored into permit limits	--		
Demineralizer Regeneration		Not factored into permit limits	--.		
Compressor Condensate		Not factored into permit limits	--		
Boiler Condensate		Not factored into permit limits	--		
Sanitary		Not factored into permit limits	*~10,000*		
Other Dilute Flows		Not factored into permit limits	*(5)*		
TOTAL FLOW		*3,998*	*5,500(6)*		

(1)~50 gal twice a year during shutdown. Hauled off-site.
(2) Permit application lists these flows. Permit based on Metal Finishing flow of 2700 gpd but qualifying MF operations are no longer present. Flows are not measured.
(3) These are dumped once a week. Flows are not measured.
(4) Flows are not measured.
(5) Unknown. Believed
(6) Flows are down now.

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

Occasionally, process wastewater from heat treat quench and cast quench is hauled off-site for treatment and disposal, but it is a small volume and is infrequent. 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 in the fire pit at the Village's monitoring port.

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?
A flow meter was installed in June 2003. Data is recorded onto a removable drive. It is calibrated every six months to a year. Calibration sticker is placed on the unit.

If estimated, describe method of estimation:

30. Is pH monitored continuously? **~~Y~~ / N**
If yes, how often is the meter calibrated?
The pH meter calibration is being done and maintained by another group on-site.

31. Does the facility collect its own samples? **Y /~~N~~**
If no, specify the sample collector:

32. Are appropriate sampling procedures followed?
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:

Advanced Analytics Laboratories in Columbus

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y /~~N~~
If yes, identify organics:
Parts washing solvent used in manufacturing, casting and maintenance departments contain 1,2,4-Trimethylbenzene. This is taken off-site for recycling by Crystal Clean.

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

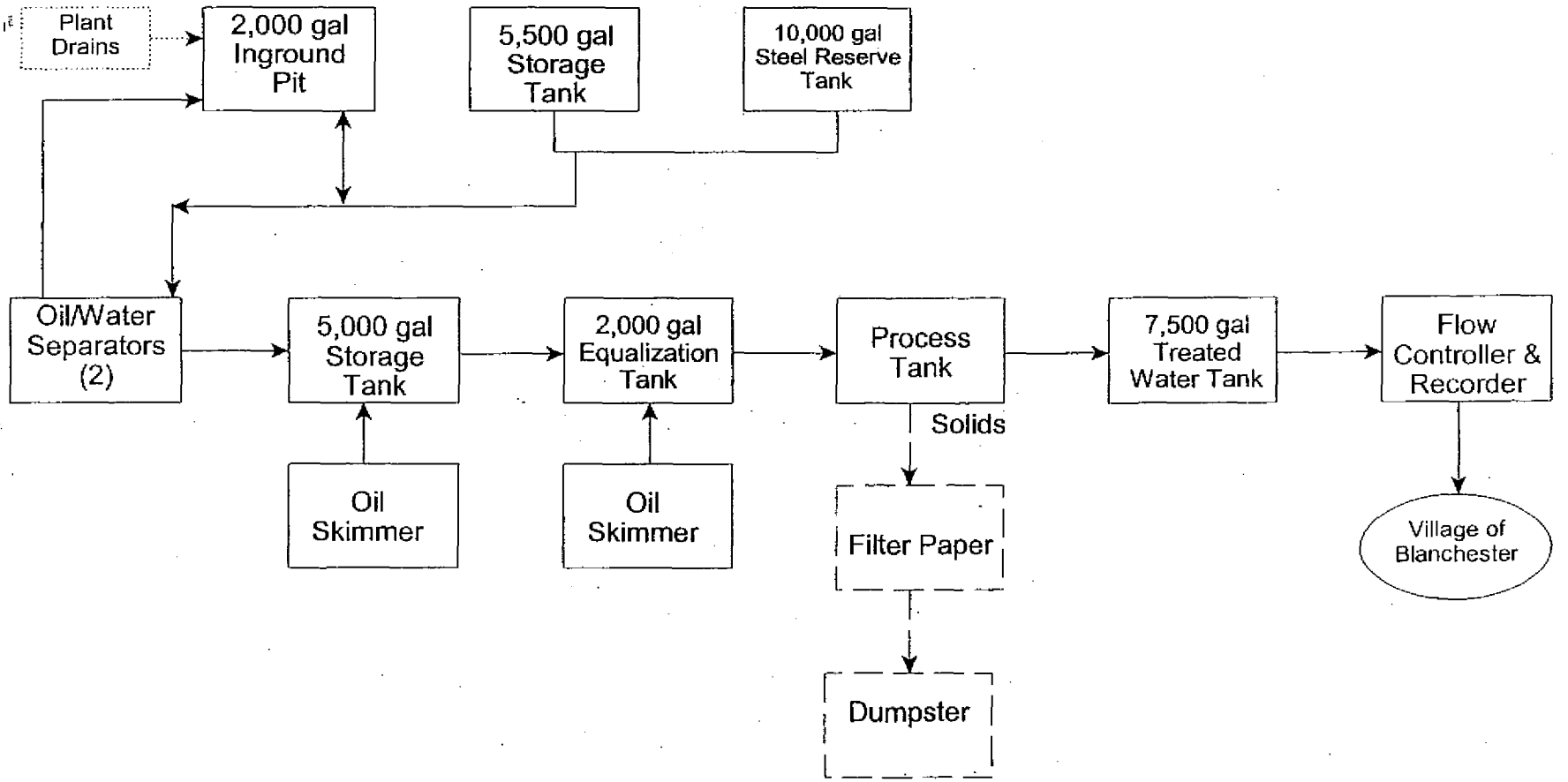
39. Identify any potential slug load or spill areas:

There was no reasonable potential. The facility maintains slug control and spill control plans as part of its contingencies. The facility also has its ISO 14001 certification.

REQUIRED FOLLOW-UP ACTIONS

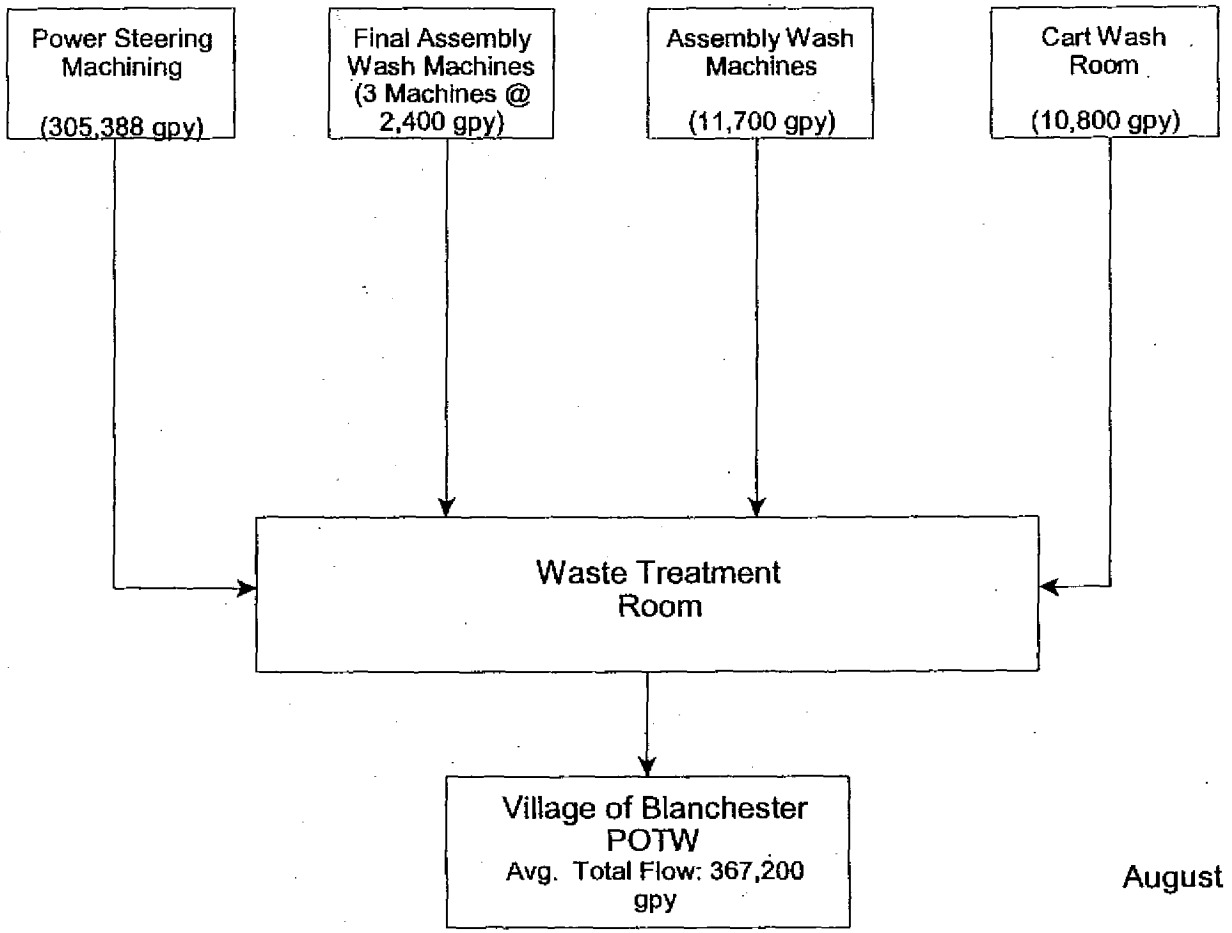
None.

American Showa Blanchester Plant Pretreatment Schematic



September 8, 2005

American Showa Blanchester Plant Process Flow Schematic



August 26, 2004