Ohio EPA
40 years and moving forward

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

August 16, 2013

Mr. Roger Miller
Xtek, Inc.
11451 Reading Road
Cincinnati, Ohio 45241

RE: Xtek, Inc., OH0048797; 1IC00018*HD – Compliance Evaluation Inspection
NOTICE OF VIOLATION

Dear Mr. Miller:

On July 23, 2013, I conducted an NPDES pre-permit/compliance evaluation (CEI) inspection at the Xtek facility. MaryBeth Holley represented the facility. The purpose of the inspection was to evaluate compliance with the terms of the NPDES. Please note that the report, by its format, tends to highlight negative areas.

As indicated on the attached NPDES Compliance Inspection Report, all areas that were rated received a satisfactory rating except for "Effluent/Receiving Stream", which received a marginal. The reason for this is detailed in the attached report.

Thank you for the time extended during the inspection. If you have any questions, feel free to contact me at (937) 285-6108.

Sincerely,

Marianne Piekutowski
Environmental Specialist II
Division of Surface Water

MP/tb

Enclosures

ec: MaryBeth Holley, Xtek, Inc.

OhioEPA

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
1IC00018*HD	OH0048798	7/23/2013	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Xtek, Inc. 11451 Reading Road Cincinnati, Ohio 45241	10:00 am	2/1/2010
	Exit Time	**Permit Expiration Date**
	11:55 am	1/31/2015

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Mary Beth Holley, EHS Manager	(513) 733-2837
Name, Address and Title of Responsible Official	**Phone Number**
Roger Miller, CEO Xtek, Inc. 11451 Reading Road Cincinnati, Ohio 45241	(513) 733-7830

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

S	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
Marianne Piekutowski — Date Division of Surface Water Southwest District Office	Martyn Burt — Date Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters..... Y
(c) Do Categorical Standards apply?...If yes, list applicable standards.. N

NA

(d) Product(s) and production rates conform with permit application (Industries)..... NA
(e) Flows and loadings conform with NPDES permit..... NA
(f) Treatment processes are as described in permit application... Y
(g) All discharges are permitted..... Y
(h) Number and location of discharge points are as described in permit..... Y
(i) Storm water discharges properly permitted..... Y

Comments/Status:

f) There is a small basin with weir and booms. The booms are on a preventative maintenance schedule.
i) There are raw materials outside. This includes a sand pile. The metal parts are not oiled. The facility is slowly cleaning up outside storage areas, but will probably never eliminate them completely. The facility has coverage under the general industrial storm water permit.

Section F: Compliance

(a) Any significant violations since the last inspection..... N
(b) Appropriate Non-compliance notification of violations..... Y
(c) Permittee is taking actions to resolve violations..... Y
(d) Permittee has a compliance schedule..... N
(e) Compliance schedule contained in...N/A
(f) Permittee is in compliance with schedule..... NA
(g) Has biomonitoring shown toxicity in discharge since last inspection NA

Comments/Status:

a) The facility had two Oil & Grease violations since the last inspection. They have resampled for Oil & Grease.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator ☐ or dual feed ☐..... NA

i. What does the back-up power source operate.....

NA

ii. How often is the generator tested under load.....

NA

(b) Which components have an alarm system available for power or equipment failures.....

NA

(c) All treatment units in service other than backup units..... NA

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

NA

(e) Any major equipment breakdown since last inspection..... NA

(f) Operation and maintenance manual provided and maintained..... NA

(g) Any plant bypasses since last inspection..... NA

(h) Any plant upsets since last inspection..... NA

Comments/Status:

The only treatment is booms and weirs on a basin. There is no active treatment of the wastewater being discharged.

Permit # : 1IC00018*HD
NPDES #: OH0048798

Section H: Sludge Management

(a) Method of Sludge Disposal...
NA

- ☐ Land Application
- ☐ Haul to Another NPDES Permitee
- ☐ Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 – High pH and High Temperature (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 3 – Other Processes (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 4 – Unknown Processes (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Composting (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Heat Drying (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Heat Treatment (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Thermophilic Aerobic Digestion (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Beta Ray Irradiation (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Gamma ray Irradiation (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Pasteurization (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 6 - Approved Equivalent Process	☐	☐	☐	☐	☐	☐	☐	☐

Permit # : 1IC00018*HD
NPDES #: OH0048798

Class B Sewage Sludge (monitoring station 581)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Aerobic Digestion (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Air Drying (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Anaerobic Digestion (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 – Composting (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Lime Treatment (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 3 – Approved Equivalent Process	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

(a) Has amount of sludge generated changed significantly since the last inspection..... NA
(b) How much sludge storage is provided at the plant.....
NA
(c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... NA
(d) Any complaints received in last year regarding sludge..... NA
(e) 5/8" screen at headworks for facilities that land apply sludge..... NA
(f) Are sludge application sites inspected to verify compliance with NPDES permit..... NA
(g) Is a contractor used for sludge disposal..... NA
If so, what is the name of the contractor.....
NA

Comments/Status:

Scrap metals go to Cohen Bros. Valicor takes waste fluids, including, used oils, coolants, pit cleanouts and unused chemicals found in the plant.

Section I: Self-Monitoring Program

Flow Measurement:

(a) Primary/Secondary flow measuring devices operated and maintained..... Y
Type of device (e.g. weir with ultrasonic level sensor):
Go by the water usage from the well water meters.

(b) Calibration frequency adequate ..... ?
(Date of last calibration:)

(c) 24-hour recording instruments operated and maintained..... NA

(d) Flow measurement equipment adequate to handle full range of flows..... Y

(e) Actual flow discharged is measured..... N

(f) Flow measuring equipment inspection frequency
☒Daily ☐Weekly ☐monthly ☐other ***There is a daily log for meter on wells.***

Comments/Status:

The facility is checking on the manufacturer's recommendation for the flow meter. Currently working on getting temperature gages for the quench calibration. Will include the flow meters on wells.

Cardinal Laboratories maintains the sampling equipment, i.e., pH meter.

Section I: Self-Monitoring Program (con't)

Sampling:

(a) Sampling location(s) are as specified by permit..... Y
(b) Parameters and sampling frequency agree with permit..... Y
(c) Permittee uses required sampling method..... Y
(see GLC page)
(d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments/Status:

Section I: Self-Monitoring Program (con't)

Laboratory:

General

(a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... NA

(b) Do SOP's include the following if applicable..... NA

- Title
- Scope and Application
- Summary
- Sample Handling and Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control
- Maintenance
- Corrective Action
- Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of know precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

(c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y

(d) If alternate analytical procedures are used, proper approval has been obtained..... NA

(e) Analyses being performed more frequently than required by permit. N

(f) If (e) is yes, are results in permittee's self-monitoring report..... NA

(g) Satisfactory calibration and maintenance of instruments/equipment. NA (see score from GLC page)

(h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Temperature, pH, Oil & Grease, TOC.
Lab name: Cardinal Laboratories

Discharge Monitoring Report Quality Assurance (DMRQA)

(a) Participation in latest USEPA quality assurance performance sampling..... NE
Date:

(b) Were any parameters "Unsatisfactory"..... NE

(c) Reasons for "Unsatisfactory" parameters.....
NA

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 1IC00018001
Outfall Description: Final outfall for quench water and storm water runoff. Outfall signage is installed. Should have a sign facing creek on fence.
Receiving Stream: Unnamed tributary to Mill Creek.
Receiving Stream Description: Modified warm water habitat.

Outfall # 1IC00018601
Outfall Description: Internal outfall for quench water. There is an over/under weir structure and booms to capture any floating material. The water was turbid between the two weirs. The water was slightly turbid on the discharge side of the second weir. There was little or no flow at the time of the inspection.
Receiving Stream: From outfall 1IC00018001 to unnamed tributary to Mill Creek.
Receiving Stream Description: Modified warm water habitat.

Outfall # 1IC00018602
Outfall Description: Internal outfall for building 14 quench water and storm water runoff. The water in the ditch was clear. There was no discharge from either of the two lines draining into the ditch.
Receiving Stream: From outfall 1IC00018001 to unnamed tributary to Mill Creek.
Receiving Stream Description: Modified warm water habitat.

Comments/Status:

Section K: Multimedia Observations

(a)	Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories.....	N
(b)	Do you notice staining or discoloration of soils, pavement or floors..	N
(c)	Do you notice distressed (unhealthy, discolored, dead) vegetation..	N
(d)	Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks.....	N
(e)	Do you notice any unusual odors or strong chemical smells.....	N
(f)	Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities.....	N

If any of the above are observed, ask the following questions:
(1) What is the cause of the condition?
(2) Is the observed condition or source a waste product?
(3) Where is the suspected contaminant normally disposed?
(4) Is this disposal permitted?
(5) How long has the condition existed and when did it begin?

Comments/Status:

There was a sand pile outside of Building 26. It is used around the furnace in heat treating. This should be included as part of the storm water pollution prevention plan (SWP3).

XTEK, INC.
NPDES COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: July 23, 2013

ITEMS FOR DISCUSSION:

The responsible official needed to be updated. The current contact was Tom Huth. Mr. Huth has taken another position at the facility. There were two Oil & Grease violations since the last inspection. The June 2013 eDMR was not submitted at the time of the inspection. It has since been submitted.

COMPLIANCE EVALUATION:

The facility's compliance history was checked from July 1, 2009 through August 1, 2013. The following violations were noted:

Outfall1IC00018001

EFFLUENT LIMIT VIOLATIONS

Date	Parameter	Reported Value	Permit Limit
01/17/12	Oil & Grease, Hexane	12 mg/L	10 mg/L
07/30/13	Oil & Grease, Hexane	16.3 mg/L	10 mg/L

Failure to comply with effluent limits is a violation of Ohio Revised Code (ORC) 6111. The reasons for these violations and steps taken to prevent them from recurring have been provided to Ohio EPA. This report will also serve as the notice of violation for these events. Because of the Oil & Grease violations and the turbidity at 601, the facility will receive a rating of Marginal for "Effluent/Receiving Water". Another sample was collected the week of August 5, 2013.

OBSERVATIONS:

Xtek, Inc. manufactures rollers for cold rolling steel. The facility receives the rollers, and then machines and heat treats them for use in the steel industry. There is no casting done on-site. The wastewater generated on-site is contact cooling water. The water is from the quenching of the rollers after coming out of the furnaces. The flow rates from the processes are taken from electronic meters on the production wells. There are three, private production wells at the facility. Two of the wells are active, and one is used as a back-up. The electronic meters were installed on the wells so flows are measured by the meters instead of using a pump count. There are two quench tanks on-site. One is the main quench tank, and the second is a smaller tank.

The two quench tanks are discharged through outfalls 601 and 602. These outfalls are sampled quarterly for Oil & Grease. The final outfall, 001, is on the unnamed tributary to Mill Creek. Outfall 001 does daily flow monitoring, and weekly monitoring for Oil & Grease, pH and Temperature. There was no flow at any of the outfalls on the day of the inspection. There is still a boom at the internal monitoring station 601. There is an extra boom in a plastic can near the outfall. Any additional process flows and the sanitary wastewater are discharged to MSD of Greater Cincinnati. Potable water is provided by Cincinnati Water Works. The on-site production wells are only used in the quench tanks.

Xtek is in the process of obtaining its ISO 14001 certification. The calibration of monitoring equipment was discussed. The facility was in the process of obtaining these services for its temperature gages on the quench tanks. The water meters on the wells will be included with this. Cardinal Laboratories maintains all other monitoring equipment used in sampling. Ohio EPA should be notified of what decisions the facility makes regarding the calibration.

The outfall signage was installed on outfall 1IC00018001. It is on the outside of the fence. The facility should include a sign facing the stream with the information. This would allow anyone walking up the tributary to see the sign.

RECOMMENDED ACTION

Xtek, Inc. should consider installing outfall signage on outfall 1IC00018001 facing the tributary. A photograph of any new signage should be submitted to this office.