



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

Re: **Notice of Violation**
Auglaize County
Industrial Paint & Strip West, LLC
Pretreatment

August 28, 2013

Mr. Rich Libby, President
Industrial Paint & Strip West, LLC
P.O. Box 10
Waynesfield, Ohio 45896

Dear Mr. Libby:

On August 15, 2013, an inspection was conducted at Industrial Paint & Strip West, LLC, 1000 Commerce Court, Waynesfield, Auglaize County. You were present and provided information on the operations and maintenance at the plant. The inspection included a tour of the facility and completion of the enclosed checklist. All process wastewater is generated from an Electro-coat line. A detailed description of the process and the wastewater treatment plant can be found on page six of the inspection checklist.

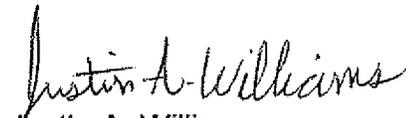
During the inspection, we discussed your toxic organic management plan (TOMP) submittal to certify that you do not have any total toxic organics (TTO) onsite. The sample results submitted with the TOMP and subsequent resampling events continue to show that phenol is being detected. According to Ohio Administrative Code (OAC) 3745-3-06, in order to be eligible to use the TTO certification statement, a baseline TTO analysis must show compliance with the appropriate TTO standard and an acceptable TOMP must be submitted. The sample results for phenol are under the TTO standard and, therefore, you are in compliance with that requirement. In order to use the TTO certification, you must submit an acceptable TOMP. You submitted a TOMP on March 20, 2012. On April 2, 2012, you were notified that the TOMP contained several deficiencies. Again, if you still wish to use the TTO certification, you must submit an acceptable TOMP. Please revise your current TOMP as identified in our April 2, 2012, email to you and resubmit it for our review.

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Also during our inspection, we discussed the facility's permit violations that occurred since our last inspection. The effluent violations that occurred are enclosed on a separate sheet. We also further discussed the reporting requirements found in Part III, Item H of your indirect discharge permit. Be reminded that when an exceedance of a daily maximum effluent limitation occurs, you are required to contact our office by telephone within 24 hours of discovery. Our office did not receive the required notification of the violations that occurred since our last inspection. **Within 14 days** of the date of this letter, submit a written response indicating the reasons for the violations on the attached sheet and what steps you have taken to prevent violations from occurring in the future.

A copy of our completed inspection report is enclosed for your records. If there are any questions, please call me at (419) 373 – 3022.

Yours truly,



Justin A. Williams
Environmental Specialist II
Division of Surface Water

/jlm

Enclosures

pc: Mr. Ron Suter, Wastewater Operator, Village of Waynesfield

ec: Mr. Ryan Laake – DSW, CO
Inspection Tracking

WASTEWATER TREATMENT

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

14. Was a PTI issued for the treatment system? **No**

15. Were there any modifications to the treatment system since the previous inspection? **NA**

If yes, was a PTI obtained? **NA**

PTI Number: _____ Date: _____

16. What is the treatment mode of operation? **Batch**

If batch, list the frequency and duration:

10 g.p.m. at 20 hours/day

17. Who is responsible for operating the treatment system?

Jim Johnson – 1st shift, David Fox – 2nd shift.

18. How often is the treatment system checked?

Check every two hours during production, more frequently if needed.

19. Is there an alarm system for the system? **Yes**

Explain:

High water alarm on rinse tank.

20. Is there an operations and maintenance manual? **Yes**

Plymouth Technology manual.

21. Is an inventory of critical spare parts maintained? **Yes**

If yes, list:

Spare pump and misc. repair parts.

22. Are there any bypasses in the system? **No**

If yes, describe the location:

Have bypasses occurred since the last inspection? **NA**

Was the POTW notified? **NA**

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated? Yes
- Method of disposal: **Offsite disposal.**
- Frequency and amount of disposal: **30 yards once per two months.**
- Name of hauler/landfill/disposal facility: **Waste Management – Evergreen Landfill, Northwood, OH.**
- Is any sludge generated subject to RCRA regulations? No
- If land applying sludge, is there a sludge management plan? NA

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
1. Electro-Coat	WWTP		7,200		
2. Powder Coat (offline)	WWTP		0		
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow			7,200		
Non-contact Cooling			0		
Blowdown			10		
Reverse Osmosis Condensate			3,000		
Demineralizer Regeneration			0		
Filter Backwash			0		
Compressor Condensate			5		
Storm Water			0		
Other Dilute Flows			0		
Unregulated Flows (provide list)			0		
Sanitary			0		
TOTAL FLOW			10,215		

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

Sanitary wastewater is directly discharged to Village of Waynesfield sanitary sewer.

SELF MONITORING

26. Sample location(s) described in the facility's permit: **Outlet of effluent tank.**

27. Is the facility sampling at the location(s) described in the permit? **Yes**
 If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? **Yes**
 If no, indicate a representative location:

29. Is the flow measured or estimated? **Measured**

If measured, how often is the meter calibrated?

NA – Measured by float.

If estimated, describe method of estimation:

30. Is pH monitored continuously? **Yes**
 If yes, how often is the meter calibrated?

Verified daily.

31. Does the facility collect its own samples? **Yes**
 If no, specify the sample collector:

32. Are appropriate sampling procedures followed? **Yes**
 Monitoring frequencies **Yes**
 Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) **Yes**
 Flow proportioned samples **NA**
 Proper preservation techniques **Yes**
 Sample holding times **Yes**
 Chain-of-custody forms **Yes**

33. Are samples analyzed in accordance with 40 CFR 136? **Yes**

34. Laboratory conducting analyses:

Alloway Environmental – Lima, OH

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? **Yes**
If yes, identify organics:

Phenols are used in laboratory. No listed organics used in processing areas.

36. Does the facility have a current toxic organic management plan(TOMP)? **No**
If yes, is it being implemented? **NA**

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: **NA.** **No**

38. Does the facility need a spill prevention plan or slug discharge control plan? **No**
If yes, does the facility have a written plan? **No**

39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS

Notes:

E-Coat Process --

- Stage 1a: Heated water pre-rinse with CK 163 cleaner
- Stage 1b: Ultrax LT 8620 cleaner spray
- Stage 2: Ultrax LT 8620 cleaner immersion
- Stage 3: Village water spray rinse
- Stage 4: Titanium salt conditioner spray rinse
- Stage 5: Chemfos 700 HNR zinc phosphate immersion
- Stage 6: Village water spray rinse
- Stage 7: Chemseal 100 non-chrome seal
- Stage 8: R/O immersion rinse
- Stage 9: R/O spray rinse
- Stage 10: 590/534 Powercrom
- Stage 11: Permeate spray (water generated from filtration unit)
- Stage 12: Permeate immersion

Wastewater Treatment Plant --

A sump pumps the wastewater to the rinse tower. From the rinse tower, the wastewater goes to an equalization tank where ferric chloride and calcium chloride are added until a pH of 4.5 S.U. is achieved. Next the wastewater travels to the neutralization tank where caustic soda is added until a pH of 9 S.U. is reached. Leaving the neutralization tank, the wastewater enters a flash tank where an anionic polymer is added. From the flash tank, the wastewater goes to a clarifier. The supernatant from the clarifier goes through an air break and is then ready for discharge. The solids from the clarifier go to a sludge holding tank and then to a plate press. The solid material from the plate press goes to a roll-off hopper and is taken to a landfill for disposal. The liquid from the plate press flows to a sump and is sent back to the rinse tower.

The effluent from the wastewater treatment plant, as observed in the clarifier, was clear, colorless, and had no noticeable odor.

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2DP00071*BP		001	00401	pH, Maximum	1D Conc	9.0	9.3	5/10/2012
2DP00071*BP		001	01067	Nickel, Total (Ni)	1D Conc	3980	7500.	12/12/2012
2DP00071*BP		001	01067	Nickel, Total (Ni)	30D Conc	2380	3795.5	12/1/2012
2DP00071*BP		001	01092	Zinc, Total (Zn)	1D Conc	2610	4630.	12/12/2012
2DP00071*BP		001	01092	Zinc, Total (Zn)	30D Conc	1480	2325.5	12/1/2012