

October 21, 2002

Mr. Fred Acme, Vice President
Acme Industries
P.O. Box 000
Defiance, Ohio 43512

Re: Annual Pretreatment Facility Inspection – Acme Street Plant

All cities with an approved pretreatment program are required to inspect their Significant Industrial Users on an annual basis. This letter will summarize the results of the inspection I conducted at the Acme Street plant with you on October 18, 2002.

I want to thank you for taking the time to review the past year's plant operations and wastewater compliance data. I also want to thank you for taking the time to provide me with a tour of the plant. We gave a close inspection in the door grinding operation area due to the continuing problem with zinc contamination from this area. Although the pretreatment system is the main generator of process wastewater in the plant, the floor cleaning in the door grinding area appears to be a problem and a source of zinc contamination in your wastewater discharge. The pretreatment system was in operation at the time of my inspection. It was well maintained and appeared to be operating properly.

A high zinc level found in the September 2002 compliance period resulted in a violation of your discharge permit and it has just been resolved through resampling. As you indicated, the source of the zinc contamination was suspected to be the floor cleaning operation and possibly even hand washing in the door grinding and finishing area. The grinding operation generates zinc dust and fines from the galvanized metal doors and this material is captured in the floor cleaning and hand washing activity and released to the plant drains. We inspected a mop sink in this area that is suspected to be a major contributor to this problem. You may want to consider removing this mop sink and plugging this floor drain to eliminate this potential source of contamination. This would require that the floor cleaning water be processed through the pretreatment system and help to eliminate the high zinc levels associated with the floor cleaning activity.

As with past inspections, the general appearance of the plant was excellent and good housekeeping practices continue to be evidenced throughout the plant. You indicated that the one floor drain remaining within the plant production area was being fitted with a bolted lid and we observed this drain during our inspection. It was observed that no chemical or oil drums were stored in the area of this drain and no obvious spill hazards were observed during our inspection. Also, we discussed limiting, to the extent possible, your plant's wastewater discharges into the City's sewer system because of the potential impact on our combined sewer overflows (CSO) during wet weather. This point is covered in more detail later in this letter.

I found no problems or areas requiring immediate attention as the result of this inspection. A review of my files indicates that all of Acme Industries' required reports have been received and are current. These reports are summarized as follows:

Baseline Monitoring Report (BMR) – This is the basic report, required under federal pretreatment regulations CFR 403.12(b)(1)-(7) and the Defiance City Sewer Use Ordinance 925.06(b), which details your plant's waste stream flow, pollutant contents, and plant processes. The BMR also serves as the renewal application form for your "Industrial User Discharge Permit". This report requires updating every five (5) years or whenever there is a significant change in the quantity or makeup of your plant's wastewater discharge. Your last update was received October 15, 1998 and the next regular update will be October of 2003. I will provide you with a blank BMR form approximately 4 months prior to this date.

Industrial User Discharge Permit – In accordance with section 925.06 of the City's Sewer Use Ordinance, this is the permit issued by Defiance to allow Acme Industries to discharge wastewater to the City sewer system. Your current permit will expire on October 1, 2003. Upon receipt and review of your updated BMR we will proceed with the renewal of your discharge permit.

Semi-Annual Compliance Report – Federal pretreatment regulations set forth in CFR 403.12(e)(1), and your Discharge Permit, require this report in connection with your wastewater discharges. The report details process and total waste flows. It is also required to contain a compliance statement for "Total Toxic Organics" (TTOs) used at the plant in lieu of having to test and analyze for TTOs every year. The report is to be submitted twice per year (by August 1st and February 1st). Your last Semi-Annual Compliance Report was received July 30, 2002. The next report is due by February 1, 2002.

Annual Performance Report - Appendix E of your Discharge Permit (Special Conditions/Requirements) requires that you submit an Annual Performance Report covering the operation of your industrial pretreatment system. If desired, this report may be submitted along with your January Semi-Annual Compliance Report, however, the due date for this report is February 15th of each year. Your most recent Annual Performance Report was received on February 14, 2002.

Toxic Organic Management Plan (TOMP) – Federal categorical pretreatment regulations for the metal plating and finishing industries as set forth in CFR 40.413.03(a)&(b), along with your Industrial User Discharge Permit, require that you submit a TOMP listing all solvents used at the plant, including the amounts, storage methods, and disposal methods. The report also is to address the control of solvent spills and leaks. This report is allowed in place of periodic monitoring and testing of your wastewater effluent for TTOs. This report must be updated every two (2) years. TTO monitoring must be done at the time of this update. The City will perform the sampling for this TTO testing and the laboratory costs will be billed to Acme Industries. Your last TOMP update was received April 16, 2001 and the next update will be due in April of 2003.

Combined Sewer Overflow (CSO) Flow Impact Minimization – One of the requirements of the City's National Pollution Discharge Elimination System (NPDES) permit No. 2PD00013*OD is that the City implement the federally mandated 9 minimum control measures to control and manage CSO discharges during wet weather periods. In response to this requirement, the City has developed and implemented a Combined Sewer System Operational Plan and a Combined Sewer System Long-Term Control Plan. These plans were filed with the Ohio EPA in October of 1997 and December of 1998 respectively. The 9 minimum controls include the requirement to modify, as necessary, the industrial pretreatment program to minimize CSO discharges during wet weather. In accordance with this requirement, you are requested to consider the impact of your plant's discharge into the City's sewer system during wet weather periods. It is important to consider limiting pretreatment system discharges and minimizing other plant wastewater discharges to the extent possible during periods of wet weather to minimize the impact on CSO discharges. Also, the release of any controllable batch wastewater discharges during wet weather conditions is prohibited.

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In closing, I would again like to thank you and Scott for your cooperation and assistance in completing this annual inspection. If there are any questions regarding this facility inspection or if I can be of help to you in any way, please give me a call at (419) 782-0841.

Sincerely

John T. Clark
Pretreatment Coordinator

cc: Gino Silvestri, Defiance WPC Superintendent