



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Southern District Headquarters  
3911 Fish Hatchery Road  
Fitchburg, Wisconsin 53711-5397

Carroll D. Besadny  
Secretary

November 18, 1987

4190  
Notice of Violation

Mr. Edward Marshall  
Oconomowoc Electroplating Company, Inc.  
W2573 Oak Street  
Ashippun, WI 53003

Dear Mr. Marshall:

There are two additional areas of state wastewater regulations (beyond those that are the involved in case 86-CV-640) that Oconomowoc Electroplating Company, Inc. (OECI) appears to have violated and is apparently still violating. These areas are:

1. The WPDES permit compliance schedule that required OECI to upgrade its effluent monitoring system; and
2. The WPDES permit discharges effluent limitations.
3. Wastewater sampling requirements.

Concerning No. 1, OECI hasn't yet completed submitting plans and specifications (required December 31, 1986) for an upgraded wastewater monitoring system. Accordingly, OECI hasn't constructed (required March 31, 1987) the system and put it into operation (required April 30, 1987).

Concerning No. #2, OECI's discharge monitoring reports (DMRs) for the period of June 10, 1985, (permit issuance date) through September 30, 1987, (the most recent DMR) show OECI violated 56 daily limitations (maximum or minimum) out of 600 samples reported on 7 pollutants (cadmium, hexavalent chromium, copper, nickel, zinc, suspended solids and pH) and 82 monthly averages out of the 139 averages available (during the period) on 9 pollutants (cadmium, hexavalent chromium, copper, nickel, silver, zinc, cyanide, oil and grease, and suspended solids). For the more recent period of January 1, 1987, through September 30, 1987, OECI's DMRs show OECI violated 4 daily maximum limitations out of 19 samples reported on 2 pollutants (copper and zinc) and 14 monthly averages out of the 22 averages available on 3 pollutants (cadmium, copper and zinc).

Concerning No. 3, OECI doesn't collect, preserve, or analyze effluent samples according to requirements of its WPDES permit and NR 219, Wis. Adm. Code. OECI doesn't collect and hold the metal sample(s) in a closed, refrigerated container and doesn't ensure that the hexavalent chromium sample is analyzed within 24 hours of collection.

OECI is risking further Department enforcement actions because of these apparent violations. You can reduce that risk by taking measures to resolve these matters. I ask that you send me a written reply within 7 days that explains what OECI has done or is doing to resolve these matters. Please contact me if you have questions.

Sincerely,



Ronald F. Curtis  
District Enforcement Specialist

RFC:cmw

cc: Dave Brodzinski - Horicon Area Office

-Bob Weber - Southern District

→ Mike Hammers - WW/2

Steve Wickland - Department of Justice

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