INSPECTION REPORT

Inspection Date:	March 1, 2022	Inspection Announced: Yes
Time:	Entry: 8:20 AM	Exit: 4:45 PM
Media:	Wastewater and Stormwater	
Statute (s)/Program(s):	Clean Water Act, NPDES, Industrial Stormwater, Direct Discharger Clean Water Act, NPDES, Pretreatment, Indirect Discharger	
Type of inspection:	CEI - Compliance Evaluation Inspection	
Access:	Granted	
Permittee Name:	Libbey Glass – Toledo Plant 27	
Facility or Site Name:	Libbey Glass – Toledo Plant 27	
Facility/Site Physical Address:	940 Ash Street	
(City, State, Zip Code)	Toledo, Ohio 43611	
County/Parish:	Lucas County	
Permit and Application Number:	OH0003115; 2IN00075*GD	
SIC or NAICS:	3229	

Inspector Signature and Date: Flatebo, Theodore Digitally signed by Flatebo, Theodore Date: 2022.04.18 10:23:42 -05'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: Bahr, Ryan Digitally signed by Bahr, Ryan Date: 2022.04.18 14:47:47 -05'00'

Persons Participating in Inspection:					
Organization/Title	**Name**	**Phone**	**Email**	**Present at Opening Conference**	**Present at Closing Conference**
EPA, Environmental Engineer	Ted Flatebo	(312) 886-9402	flatebo.ted@epa.gov	Yes	Yes
EPA, Life Scientist	Anne Marie Vincent	(440) 250-1720	vincent.annemarie@epa.gov	Yes	Yes
Libbey Glass, Director Global EH&S	Jim Burk	(419) 461-3405	jburk@libbey.com	Yes	Yes
Libbey Glass, EH&S Manager	Ashley Reeves	(419) 280-4375	areeve@libbey.com	Yes	Yes
Libbey Glass, Plant Manager	Mike Rounds	(419) 727-2315	mround@libbey.com	Yes	Yes
Libbey Glass, Plant Engineer	John Johnson	(419) 727-2410	jjohns@libbey.com	Yes	Yes

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SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Inspectors Ted Flatebo and Anne Marie Vincent arrived at Libbey Glass (the "Site" or "Facility"), located at 940 Ash Street, Toledo, Ohio 43611, at 08:20 AM on March 1, 2022 for an announced inspection. The inspectors presented their credentials to site representatives Jim Burk, Ashley Reeves, Mike Rounds, and John Johnson and informed them that this was an EPA Region 5 (EPA) inspection to determine compliance with the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) permit program and Categorical Pretreatment regulations. The inspection was conducted under the authority of the CWA NPDES permit program and Section 308 of the Clean Water Act (CWA). The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Facility representatives, observations made by the EPA inspectors, and records and reports maintained by the permittee, Ohio Environmental Protection Agency (Ohio EPA), and EPA Region 5. These include the following: direct observations made by the EPA inspectors, photographs taken by EPA inspectors, and verbal or written statements made or supplied by Facility representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, Ohio EPA, and public records may be included in this report. During the opening conference, facility representatives were asked if they considered any information confidential business information (CBI). Mr. Rounds stated that the portions of the mechanical manufacturing process were considered CBI. EPA inspectors determined the information regarding the physical mechanical components involved in the glass forming process the facility considered CBI were outside the scope of this inspection and therefore no CBI was collected.

Background Information

Mr. Flatebo and Ms. Vincent confirmed the following facility information:

Stormwater generated at the facility is covered by an NPDES permit issued by the Ohio Environmental Protection Agency, Permit No: 2IN00075*GD, based on application OH0003115. The effective date of the permit is February 1, 2020, and the permit is scheduled to expire on January 31, 2025.

Process wastewater generated at the facility is covered by a City of Toledo Order to Discharge, Permit No: 056-20. The permit places pretreatment program prohibited discharges and local limits effluent requirements on wastewater discharged to the sanitary sewer. The effective date of the permit is September 15, 2020, and the permit is scheduled to expire on September 15, 2023. The facility is classified as a Significant Industrial User (SIU) by the City of Toledo, which is an approved Control Authority under the NPDES program.

The facility began operations at its current Toledo, Ohio site in 1893. The property covers approximately 64 acres. A small portion of that amount lies northwest of the facility's fence line across the Greenbelt Parkway. These small plots of land are not utilized for any business activities. The facility has approximately 734,000 ft^2 of manufacturing space, 713,000 ft^2 of warehouse storage space, and 55,000 ft^2 of additional building space on the property.

The facility produces glassware and operates 24 hours a day, 7 days a week with an annual shut down for maintenance activities lasting four to six days at the end of December. During this time, the furnaces remain active and molten glass is still produced but is not manufactured into final products. The facility produces approximately 500,000 finished glass units per day. There are three shifts per day that currently employ approximately 685 total employees. If fully staffed, the facility would employ approximately 720 employees.

The facility utilizes ten production lines. Raw materials including sand, limestone, and soda ash are brought to the facility via rail and truck. Recycled glass, known as cullet, is also utilized in the manufacturing process, but the facility does not accept cullet from outside sources. All the cullet used is generated on site. Finished

products leave the facility via trucks. The site historically had a combined sewer system which was separated in 2013 in coordination with the City of Toledo.

SECTION II – INSPECTION

Stormwater

The facility has six NPDES permitted outfalls. Each outfall discharges to Lucas County Creek #1139 that flows along the northwest property line. Per the facility's NPDES permit, the outfalls have the following contributing flows:

Outfall 001 – Non-contact cooling water from overflow of cooling tower
Outfall 003 – City water from fire system flushing, valve leak, and stormwater
Outfall 011 – Effluent from a groundwater treatment system
Outfall 012 – Stormwater
Outfall 014 – Stormwater
Outfall 015 – Stormwater

The facility has a fire suppression system that historically relied upon an onsite water tower for water. That tower was removed from service and demolished in 2021. The system currently relies upon City of Toledo (City) water to operate. The facility is connected to City water at two locations. Both locations have a back-up generator to provide power to the fire suppression pumps; one is electric powered and the other is diesel powered. Both of the back-up generators are exercised weekly to ensure functionality, the electrical one for 7 minutes per week and the diesel one for 30 minutes per week. While being exercised, the pumps pressurize the fire suppression system and, if functioning correctly, activate a post indicator valve (PIV) that will open and release pressurized water from the system. The water released from these weekly tests flow to Outfall 003. Historically one of the PIV's had a consistent leak that contributed a slow but steady flow of water to Outfall 003. According to Mr. Johnson, the PIV was repaired in April 2020 and no longer leaks.

In approximately 1970, the facility constructed a large warehouse at the southwest end of the property on the site of a former chemical company. The ground that the building was constructed on needs to be consistently dewatered to ensure stability and so dewatering pumps were installed. In approximately 1998, the facility began to treat this groundwater prior to discharge. The groundwater treatment system is comprised of bag filters and an air stripper. The air from the stripper then passes through an activated carbon filter media. See treatment diagram in Photo 29. According to Mr. Burk, the facility has had difficulty obtaining floats to activate the wet well pumps. Therefore, since approximately January 2022, the groundwater treatment system has been turned on and off manually. Effluent from this treatment system is discharged through Outfall 011. At the time of the inspection, the treatment system was operating and water was being discharged through Outfall 011.

Outfall 12 utilizes a treatment unit (VortSentry® solids separator with an oil/grease trap) to remove solids and oil/grease (O&G) from the stormwater that passes through this outfall. The treatment unit is located immediately upstream of the sample location in manhole 33. At the time of the inspection there was no flow observed at this sample location.

The facility's NPDES permit requires that total daily flow be estimated at Outfalls 001, 003, 012, 014, 015, and measured at Outfall 011 daily. Mr. Burk stated that the facility does not directly measure or monitor the total daily flow at any of the Outfalls but rather calculates it using a model. The value the facility reports on its Discharge Monitoring Reports (DMRs) is calculated using a model developed for the facility which uses the rainfall amount and the total square footage of impervious surfaces that contribute to each Outfall.

The facility relies on a contractor to collect and analyze all NPDES compliance samples. Per the NPDES permit, samples should be collected within the first 30 minutes of a qualifying storm event. If samples are collected after that window, or no samples are collected, the facility is required to provide an explanation as to why they were not collected in accordance with the permit.

Per Mr. Burk, the facility has had difficulty with their sampling contractor having enough employees to reliably collect samples during rain events. Additionally, the agreement the facility has with the contractor requires monthly samples regardless if a qualify storm event took place. Ms. Reeves noted that if samples had not been taken by the 28th of the month, the contractor would collect samples on the 28th. Mr. Burk stated that samples would be collected if the flow from the sampling location was even just a few drops. The analytical reports/field notes produced by the contractor, and reviewed by EPA, did not clearly indicate if the samples were taken during a qualifying rain event, if samples were collected during the first 30 minutes of a qualifying rain event, or what rate of flow was observed during sampling. In the approximately two years Mr. Burk has been employed by Libbey Glass, he stated that he reported all sample results on his DMRs as if they were taken during a qualifying rain event.

The facility utilizes filter cloth in its stormwater inlets as a best management practice (BMP) to remove solids from the stormwater. Additionally, the facility has a sweeping machine it uses both indoors and outdoors to clean up debris. Mr. Johnson stated there are standing work orders to routinely check the filter cloth and use the sweeper to prevent stormwater pollution.

Below is a table of the observations made at each Outfall during the inspection:

Outfall	Flowing	Observations
001	Not Observed	Did not observe.
003	Yes	Flow of ~1 gallon/minute. No concerns noted.
011	Yes	Flow of ~25 gallons/minute. Small oil sheen at Outfall in Lucas County Creek.
012	No	Observed Vortex treatment system in manhole 33. No concerns noted.
014	No	Observed sampling location in manhole 307. No concerns noted.
015	Not Observed	Did not observe.

Process Wastewater

The facility utilizes water in its manufacturing process primarily to cool down machinery that comes in direct contact with molten glass. A combination of potable water, oil, and chlorine are sprayed directly on the sheers

used to cut the molten glass as it exits the furnace and enters the forming machine. Potable water and a mold cooling additive, a surfactant, are also sprayed on the exterior of the glass molds to cool them. Water from both these sources falls freely from the machine, through a grated floor and to what is called the "basement" level which is the ground floor. After the glass is formed, it goes through an annealing oven to further solidify. After glass pieces exit the annealing oven, they are sprayed with an anti-scratch coating, which is composed of deionized water and the dissolved powder called Mapeg S 40K. These sprayers do not generate a waste stream.

According to Mr. Rounds, the water used to cool the sheers and molds must be high quality water in order to produce an unblemished glass product. These are the only two inputs of potable water into the manufacturing process, which occur at each of the ten production lines. After the water falls to the basement, it enters a treatment system where it can be recycled and reused in the facility. A high volume of recycled water is utilized at each production line to keep cullet from clogging the machine. This water and cullet also fall to the basement level. The glass is caught in a large container and the water is allowed to overflow out of the container and onto the floor. From there the water sheet flows to a trough in the floor that carries it to a large pit. This pit is utilized to let solids, primarily cullet, settle out. The water then flows to an oil-water separator. From there it flows to a second large pit where solids are again allowed to settle out. At this point the water is either discharged to the City of Toledo sanitary sewer system or recycled for use in the facility. The facility has a contractor come on site to sample the recirculating water and to adjust its chemistry as needed to ensure it is suitable for use in production on a routine basis.

Categorical Pretreatment Standards

Ms. Reeves classified the manufacturing process at the facility as covered by standard industrial classification (SIC) code 3229 – pressed and blown glass and glassware, not elsewhere classified. 40 C.F.R. 426 is the categorical pretreatment standard for glass manufacturing, with subpart H covering glass container manufacturing. Under this subpart, 40 C.F.R. 426.85 outlines the effluent standards for new sources. For this regulation the new source date is August 21, 1974. There are no categorical pretreatment standards for existing sources of glass container manufacturers.

Production at this facility began in 1893. When asked about significant process changes since 1974, Mr. Rounds stated that the process used has not changed. He did state that in his approximate 35 years working at the facility, that the number of production lines has been reduced from thirteen to the current ten lines. He also stated that in the past few years the facility replaced one of the forming machines with a machine brought in from another factory owned by the company. The auxiliary equipment around the forming machine remained the same following the forming machine replacement.

SECTION III – OBSERVATIONS

Observations may not be in sequential order.

Unique Identifying No.	Observation	Area of Concern?
TF-OB-001	Throughout the site, there are numerous manhole covers that have the word 'sewer' embossed on them. Not all of these manholes lead to the sanitary sewer, some lead to the storm sewer.	No
TF-OB-002	The ground surface in the dirty cullet storage area adjacent to the powerhouse is sloped so that stormwater flows into this storage area and then is captured. This is not consistent with minimizing exposure of stormwater to pollution sources. The facility does not have a plan for how to dispose of this stormwater other than through evaporation.	No
TF-OB-003	One of the pumps that recycles water to the cooling towers is currently down for maintenance. Therefore, there is likely an increase in the volume of cooling water being discharged through Outfall 001 compared to normal operations. This increased inflow has not been incorporated in the model used by the facility to estimate daily flows.	Yes
TF-OB-004	The water adjacent to Outfall 012 in Lucas County Creek had an oily sheen.	Yes
TF-OB-005	There were various 55-gallon drums and pallet totes stored outdoors throughout the facility that did not have secondary containment and were stored in the immediate vicinity of a storm drain.	Yes
TF-OB-006	The facility does not currently have the ability to collect NPDES compliance samples; they are fully reliant upon a contractor to perform these duties on their behalf.	Yes
TF-OB-007	The facility does not accurately estimate the volume of stormwater that is discharged through Outfall 003. The two fire suppression system backup generators are each tested weekly and through the tests water is discharged. This discharge does not appear to be incorporated into the model the facility uses to estimate the flow through each Outfall.	Yes
TF-OB-008	The fire suppression system backup generators are each tested weekly and discharge water through Outfall 003 with no treatment. The water discharged during this process is potable water that contains residual chlorine. Outfall 003 has a total residual chlorine effluent limit daily maximum concentration of 0.038 mg/L and a monthly average concentration of 0.015 mg/L. It was unclear if compliance samples taken from Outfall 003 captured discharge from fire	Yes

Unique Identifying No.	Observation	Area of Concern?
	suppression system testing activities and therefore may not have been representative samples as required by the Permit.	
TF-OB-009	Some NPDES compliance samples collected by the facility's contractor do not appear to be representative samples.	Yes
TF-OB-010	The facility was unable to provide specific details regarding process changes that have occurred since August 23, 1974. This is the new source date for glass manufacturing categorical process discharges, 40 C.F.R. 426 Subpart H – Glass Container Manufacturing.	Yes
TF-OB-011	The facility relies completely on a model to estimate total daily flow from Outfalls 001, 003, 012, 014, and 015. There is no method to verify if the model is performing correctly or if unexpected flows are present.	Yes
TF-OB-012	There was a moderate amount of glass waste outdoors throughout the facility. This waste has the potential to be discharged with stormwater.	Yes

SECTION IV – RECORDS REVIEW

Records may not be in sequential order.

Unique Identifying No.	Record	Area of Concern?
TF-RR-001	The NPDES compliance sample lab reports field data sheets were all missing the name of the individual who performed the sampling.	Yes
TF-RR-002	The NPDES compliance sample lab reports use an inconsistent naming system to identify where the sample was taken. In the November 2021 analytical results provided to EPA, some sampling locations used the Outfall number and the manhole number while others used the Outfall number and a description of the location sampled.	Yes
TF-RR-003	The stormwater pollution prevention plan (SWPPP) is deficient in a number of items, including: -The 2021 annual Report was not completed during the 2021 calendar year; -Annual employee training records were absent; -General location map was not legible; -Spill prevention and response procedures reference the spill prevention, control, and countermeasure (SPCC) plan but that plan itself is absent;	Yes

Unique Identifying No.	Record	Area of Concern?
TF-RR-004	The facility uses multiple additives in its cooling towers but was unable to provide a written approval from Ohio EPA showing these additives had been approved for use. Additives used at the facility include, but are not limited to: Summit CWT-1450 (cooling water antifoulant), Summit CTW-3311 (phosphate based corrosion inhibitor), Biosol 155 (mixed isothiazolins biocide), C-950 (solidum hypochlorite and sodium hydroxide), C-900 (oil dispersant), and CWT-353 (oil dispersant).	Yes
TF-RR-005	The facility conducted monthly sampling of its discharges to the sanitary sewer. Per the City of Toledo permit, this additional sampling should be reported to the POTW.	Yes
TF-RR-006	The facility has numerous effluent violations. From January 2019 to March 2022, the following violations have been identified: -Chlorine, total residual (monthly): 5 quarters, maximum of 7767% over limit -Chlorine, total residual (non-monthly): 5 quarters, maximum of 3005% over limit -1,2-Dichloroethene (monthly): 1 quarter, 204% over limit -Solids, total suspended (monthly): 2 quarters, maximum of 43% over limit -Solids, total suspended (non-monthly): 4 quarters, maximum of 50% over limit -Cyanide, total [as CN] (monthly): 2 quarters, maximum of 100% over limit -Oil and Grease [soxhlet extra] total (non-monthly): 1 quarter, 2% over limit -pH (non-monthly): 1 quarter -pH (monthly): 7 quarters	Yes
TF-RR-007	2021 Annual SWPPP Report did not correctly identify repeated total residual chlorine effluent violations as reason corrective actions would need to be undertaken.	Yes
TF-RR-008	2021 Annual SWPPP Report identified pH effluent violations as a reason a corrective action had to be taken. A corrective action report was absent.	Yes
TF-RR-009	The facility provided one SWPPP quarterly inspection conducted on March 31, 2022. The inspection was deficient in the following: -Outfall 015 was not inspected -It was unclear if there had been precipitation in the previous 24 hours and if that precipitation was a qualifying rain event -It was unclear if only visual samples were collected or if analytical samples were also collected -Outfall 001 was flowing at the time of inspection and the flow was identified as stormwater but the NPDES permit does not identify stormwater as a contributing source of water to this Outfall, only non-contact cooling water	Yes

Unique Identifying No.	Record	Area of Concern?
	-Unclear what "Any previous discharge of pollutants" means. Is this intended to fulfill the requirement of identifying any previous unidentified discharges of pollutants from the site?	
TF-RR-010	The compliance sample analytical reports/field notes produced by the facility did not clearly indicate if the samples were taken during a qualifying rain event, if samples were collected during the first 30 minutes of a qualifying rain event, or what rate of flow was observed during sampling.	Yes

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No samples were collected as part of this NPDES inspection.

SECTION VI - AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Unique Identifying No.	Record
TF-OB-003	One of the pumps that recycles water to the cooling towers is currently down for maintenance. Therefore, there is likely an increase in the volume of cooling water being discharged through Outfall 001 compared to normal operations. This increased inflow has not been incorporated in the model used by the facility to estimate daily flows. **Ohio NPDES Permit 2IN00075*GD, Part I.A**
TF-OB-004	The water adjacent to Outfall 012 in Lucas County Creek had an oily sheen. **Ohio NPDES Permit 2IN00075*GD, General Effluent Limitations** The effluent shall, at all times, be free of substances: B. Of an oily, greasy, of surface-active nature, and or other floating debris, in amount that will from noticeable accumulations of sum, foam, or sheen.
TF-OB-005	There were various 55-gallon drums and pallet totes stored outdoors throughout the facility that did not have secondary containment and were stored in the immediate vicinity of a storm drain. **Ohio NPDES Permit 2IN00075*GD, Part IV.C**

	4 – You shall minimize the potential for leaks, spills, and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur. At a minimum, you shall implement: b – Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedure for material storage and handling.
TF-OB-006	The facility does not currently have the ability to collect NPDES compliance samples, they are fully reliant upon a contractor to perform these duties on their behalf. **Ohio NPDES Permit 2IN00075*GD, Part I.A**
TF-OB-007	The facility does not accurately estimate the volume of stormwater that is discharged through Outfall 003. The two fire suppression system backup generators are each tested weekly and in doing so discharge water. This discharge does not appear to be incorporated into the model the facility uses to estimate the flow through each Outfall. **Ohio NPDES Permit 2IN00075*GD, Part I.A**
TF-OB-008	The fire suppression system backup generators are each tested weekly and discharge water through Outfall 003 with no pretreatment. The water discharged during this process is potable water that likely contains residual chlorine. Outfall 003 has total residual chlorine effluent limit daily maximum concentration of 0.038 mg/L and a monthly average concentration of 0.015 mg/L. It was unclear if compliance samples taken from Outfall 003 captured discharge from fire suppression system testing activities and therefore may not have been representative samples as required by the Permit. **Ohio NPDES Permit 2IN00075*GD, Part I.A – Final Outfall 003**
TF-OB-009	Some NPDES compliance samples collected by the facility's contractor do not appear to be representative samples. **Ohio NPDES Permit 2IN00075*GD, Part I.A** C. Grab samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's performance.
TF-OB-010	The facility was unable to provide specific details regarding process changes that have occurred since August 23, 1974. This is the new source date for glass manufacturing categorical process discharges, 40 C.F.R. 426 Subpart H – Glass Container Manufacturing. **40 C.F.R. 403.3.m.1** The term *New Source* means any building, structure, facility or installation from which there is or may be a Discharge of pollutants, the construction of which commenced after

	the publication of proposed Pretreatment Standards under section 307(c) of the Act which will be applicable to such source if such Standards are thereafter promulgated in accordance with that section, *provided that:* (i) The building, structure, facility or installation is constructed at a site at which no other source is located; or (ii) The building, structure, facility or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or (iii) The production or wastewater generating processes of the building, structure, facility or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source should be considered.
TF-OB-011	The facility relies on a model to estimate total daily flow from Outfalls 001, 003, 012, 014, and 015. There is no procedure in place to verify if the model is performing correctly or if unexpected flows are present. **Ohio NPDES Permit 2IN00075*GD, Part I.A**
TF-OB-012	There was a moderate amount of glass waste outdoors throughout the facility. This waste has the potential to be discharged with stormwater. **Ohio NPDES Permit 2IN00075*GD, Part IV.C** 2. Good Housekeeping: you shall keep clean all exposed areas that are potential sources of pollutant, such measure as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.
TF-RR-001	The NPDES compliance sample lab reports field data sheets were all missing the name of the individual who performed the sampling. **Ohio NPDES Permit 2IN00075*GD, Part III.6** For each measurement or sample taken pursuant to the requirement of this permit, the permittee shall record the following information: B. The person(s) who performed the sampling or measurements
TF-RR-002	The NPDES compliance sample lab reports use an inconsistent naming system to identify where the sample was taken. In the November 2021 analytical results provided to EPA, some sampling locations used the Outfall number and the manhole number while others used the Outfall number and a description of the location sampled.

	Ohio NPDES Permit 2IN00075*GD, General Conditions 6 – For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information: A – The exact place and date of sampling.
TF-RR-003	The stormwater pollution prevention plan (SWPPP) is deficient in a number of items, including: -The 2021 annual Report was not completed during the 2021 calendar year; -Routine inspection records were absent; -Annual employee training records were absent; -General location map was not legible; -Spill prevention and response procedures reference the spill prevention, control, and countermeasure (SPCC) plan but that plan itself is absent; **Ohio NPDES Permit 2IN00075*GD, Part IV**
TF-RR-004	The facility uses multiple additives in its cooling towers and boilers but was unable to provide a written approval from Ohio EPA showing this additive had been approved for use. Additives include, but are not limited to: Summit CWT-1450 (cooling water antifoulant), Summit CTW-3311 (phosphate based corrosion inhibitor), Biosol 155 (mixed isothiazolins biocide), C-950 (solidum hypochlorite and sodium hydroxide), C-900 (oil dispersant), and CWT-353 (oil dispersant). **Ohio NPDES Permit 2IN00075*GD, Part II.A** D – In the event that the permittee's operation requires the use of cooling or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use. Discharges of these additives must meet Ohio Water Quality Standards and shall not be harmful or inimical to aquatic life. Reporting and testing requirements to apply for permission to use additives can be obtained from the Ohio EPA, Central Office, Division of Surface Water, NPDES Permit Unit. This information is also available on the DSW website: http://www.epa.ohio.gov/portals/35/policy/01_22u2.pdf .
TF-RR-006	The facility has numerous effluent violations. From January 2019, the following violations have been identified: -Chlorine, total residual (monthly): 5 quarters, maximum of 7767% over limit - Chlorine, total residual (non-monthly): 5 quarters, maximum of 3005% over limit -1,2-Dichloroethene (monthly): 1 quarter, 204% over limit -Solids, total suspended (monthly): 2 quarters, maximum of 43% over limit

	-Solids, total suspended (non-monthly): 4 quarters, maximum of 50% over limit -Cyanide, total [as CN] (monthly): 2 quarters, maximum of 100% over limit -Oil and Grease [soxhlet extra] total (non-monthly): 1 quarter, 2% over limit -pH (non-monthly): 1 quarter -pH (monthly): 7 quarters **Ohio NPDES Permit 2IN00075*GD, Part I, Section A**
TF-RR-007	2021 Annual SWPPP Report did not correctly identify repeated total residual chlorine effluent violations as reason corrective actions would need to be undertaken. **Ohio NPDES Permit 2IN00075*GD, Part IV, Section D.1**
TF-RR-008	2021 Annual SWPPP Report identified pH effluent violations as a reason a corrective action needed had to be taken. A corrective action report was absent. **Ohio NPDES Permit 2IN00075*GD, Part IV, Section D.4**
TF-RR-009	The facility provided one SWPPP quarterly inspection conducted on March 31, 2022. The inspection was deficient in the following items: -Outfall 015 was not inspected -It was unclear if there had been precipitation in the previous 24 hours and if that precipitation was a qualifying rain event -It was unclear if only visual samples were collected or if analytical samples were also collected -Outfall 001 was flowing at the time of inspection and the flow was identified as stormwater but the NPDES permit does not identify stormwater as a contributing source of water to this Outfall, only non-contact cooling water -Unclear what "Any previous discharge of pollutants" means. Is this intended to fulfill the requirement of identifying any previous unidentified discharges of pollutants from the site? **Ohio NPDES Permit 2IN00075*GD, Part IV, Section E.1**
TF-RR-010	The compliance sample analytical reports/field notes produced by the facility did not clearly indicate if the samples were taken during a qualifying rain event, if samples were collected during the first 30 minutes of a qualifying rain event, or what rate of flow was observed during sampling. **Ohio NPDES Permit 2IN00075*GD, Part IV, Section E.1**

SECTION VII – CLOSING CONFERENCE

Closing Conference

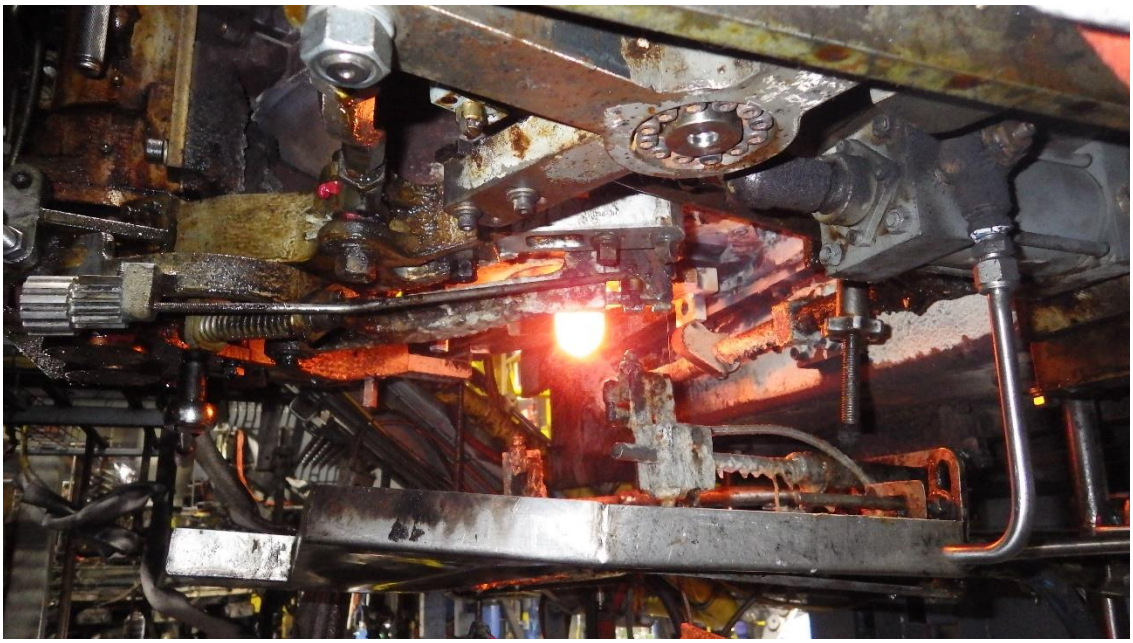
Mr. Flatebo and Mrs. Vincent held a closing conference with Facility personnel beginning at approximately 4:00 PM. During the closing conference, inspectors discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VIII – LIST OF APPENDICES

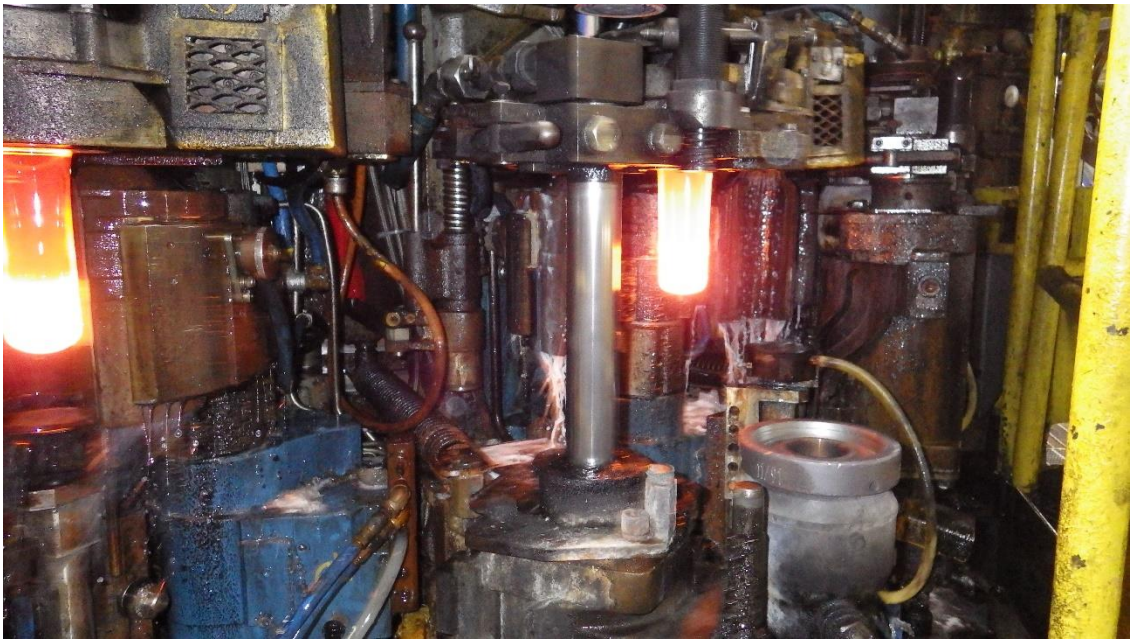
Appendix 1 – Photo Log

Appendix 1

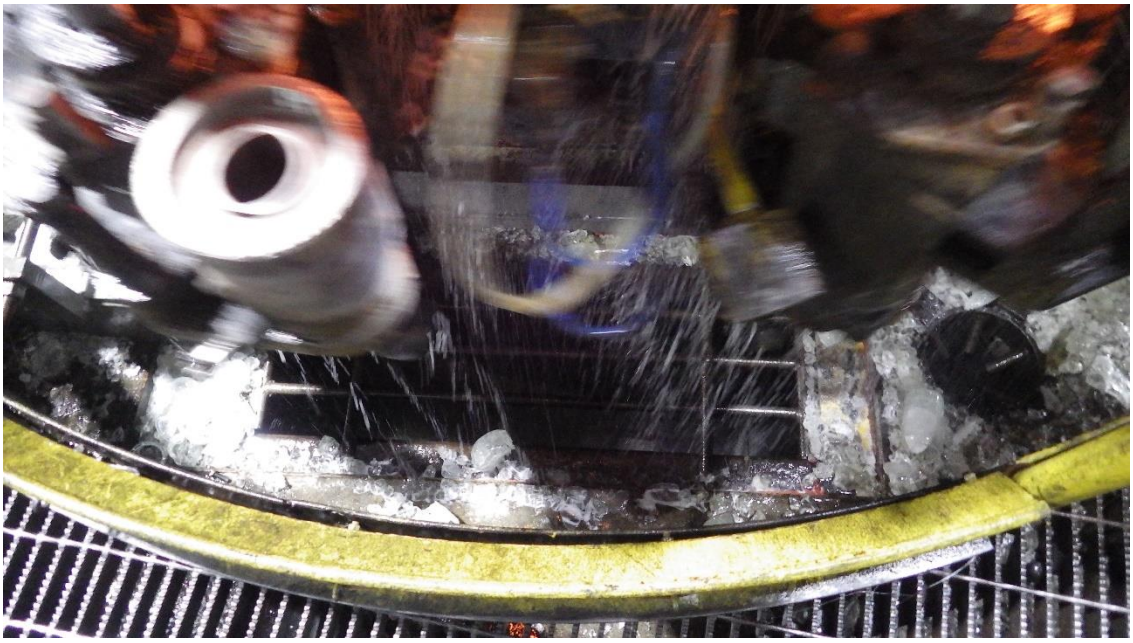
Libbey Glass
EPA Inspection March 1, 2022
All photos taken by Ted Flatebo, Environmental Engineer, U.S. EPA
Camera: Richo WG-4



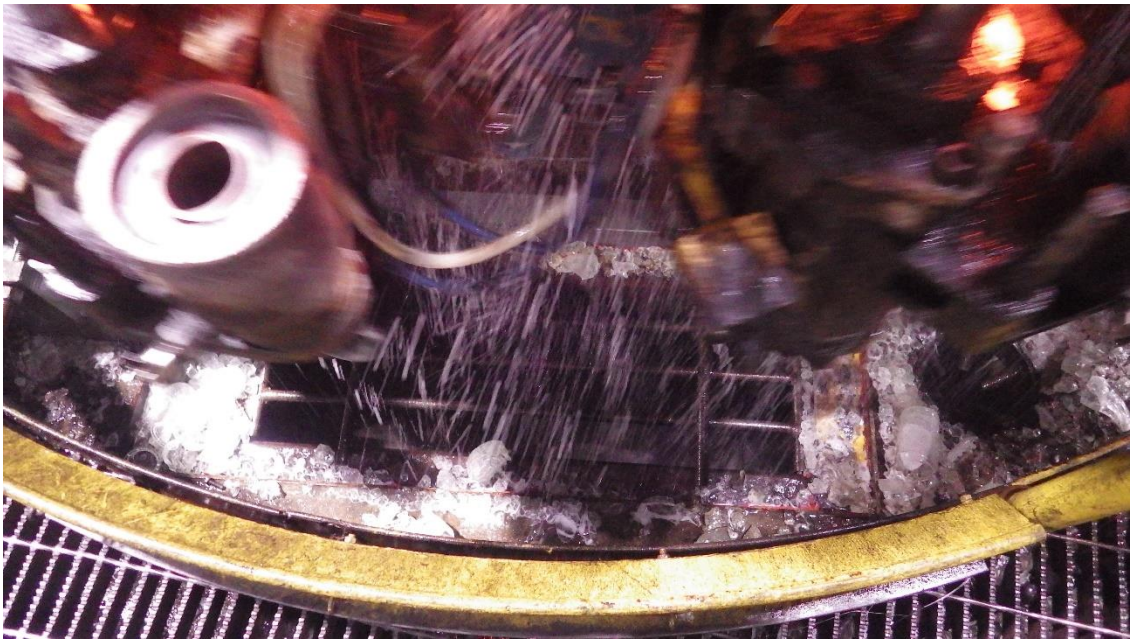
1: RIMG0003
Description: Sheers cutting molten glass while being sprayed with water, oil, and chlorine mixture.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:45AM



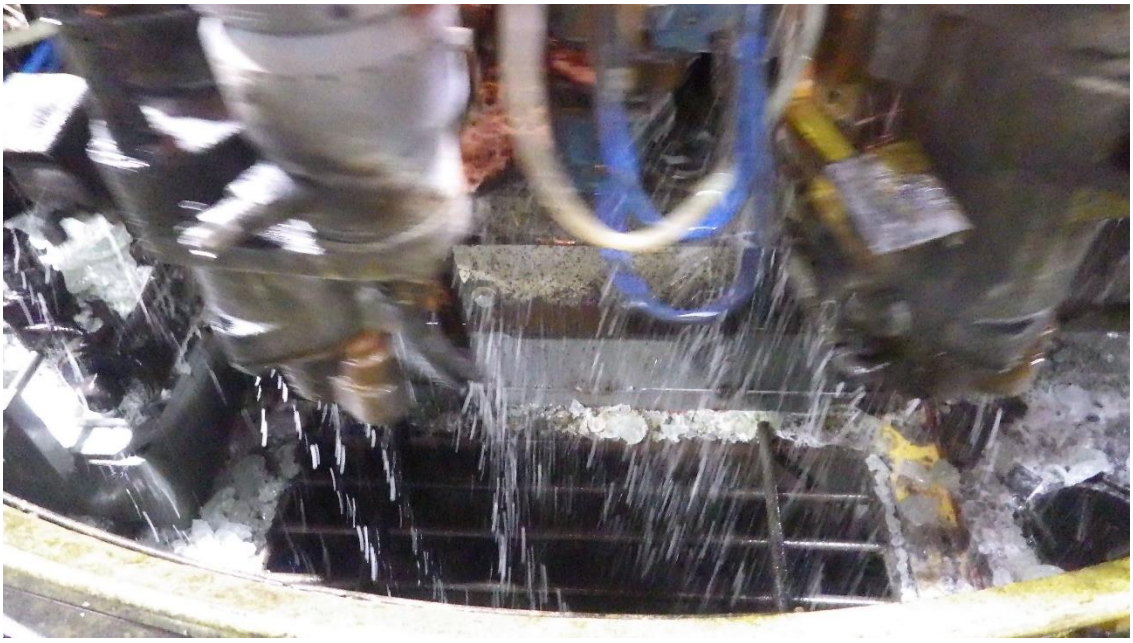
2: RIMG0004
Description: Combination of water and mold cooling additive sprayed on molds as they form molten glass.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:45AM



3: RIMG0005
Description: Water falling from forming machine through grate into basement area.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:45AM

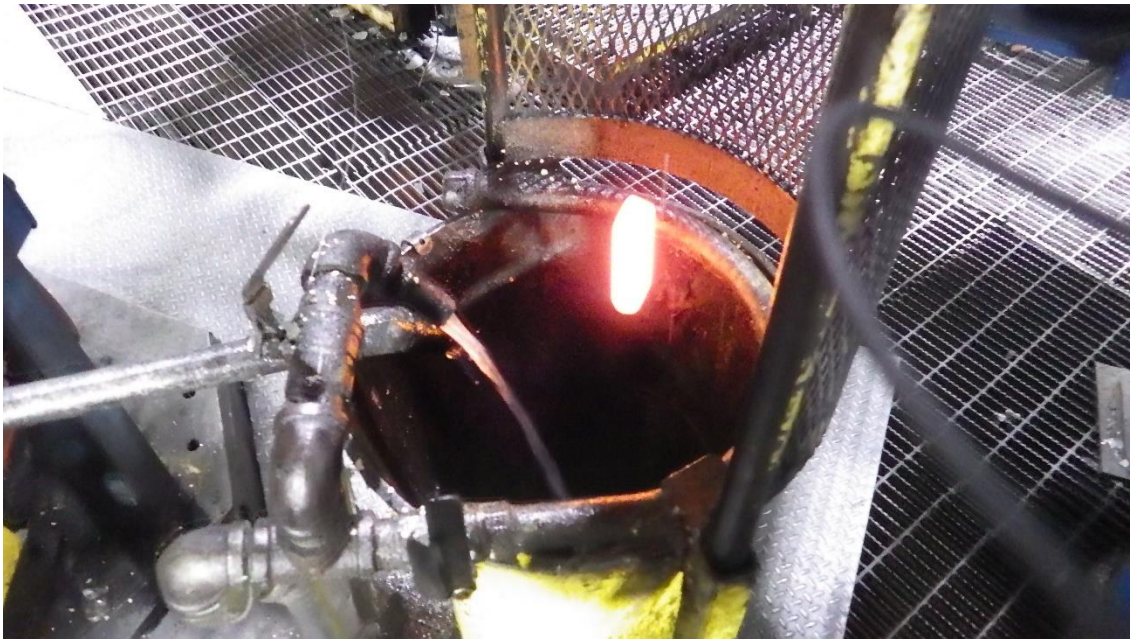


4: RIMG0006
Description: Duplicate photo of water falling from forming machine through grate into basement area.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:46AM



5: RIMG0007
Description: Duplicate photo of water falling from forming machine through grate into basement area.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:46AM

6: RIMG0008
Description: Recyled water used to flush machine to prevent clogging.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:48AM



7: RIMG0009
Description: Machine offline but molten glass is still produced and sent to the basement with a flush of recycled water.
Location: Hot production area – Machine G-6.
Date/Time: March 1, 2022, 10:49AM

8: RIMG0010
Description: Two, 2,000-gallon tanks in background used to store mold cooling additive. Tote in foreground storing additional chemicals used in production.
Location: Hot production area.
Date/Time: March 1, 2022, 10:55AM

9: RIMG0011
Description: Molten glass cutting sheer oil additive tank.
Location: Sheer spray mix area.
Date/Time: March 1, 2022, 11:03AM

10: RIMG0012
Description: Overview of sheer oil and chlorine tanks.
Location: Sheer sray mix area.
Date/Time: March 1, 2022, 11:04AM

11: RIMG0013
Description: Mix tank for deionized water and Mapeg S 40K.
Location: Cold end spray mix room.
Date/Time: March 1, 2022, 11:10AM

12: RIMG0014
Description: Overview of cold end spray mix room.
Location: Cold end spray mix room.
Date/Time: March 1, 2022, 11:10AM

13: RIMG0015
Description: Cooling lines for G furnace electric boost electrodes.
Location: Hot production area.
Date/Time: March 1, 2022, 11:15AM

14: RIMG0016
Description: Example of a storm drain lined with a filter fabric. Note water flowing towards the storm drain is snow/ice melt water.
Location: Storm drain surface inlet to Outfall 014 located northwest of facility rail spur
Date/Time: March 1, 2022, 11:30AM

15: RIMG0017
Description: Outfall 014 sample location. No flow observed.
Location: Facility rail spur area
Date/Time: March 1, 2022, 11:32AM

16: RIMG0018
Description: End of trench drain that collects stormwater between the power plant and the dirty cullet storage area.
Location: South end of the power plant.
Date/Time: March 1, 2022, 11:42AM

17: RIMG0019
Description: End of trench drain that collects stormwater between the power plant and the dirty cullet storage area.
Location: South end of the power plant.
Date/Time: March 1, 2022, 11:42AM

18: RIMG0020
Description: Overview of trench drain that collects stormwater between the power plant and the dirty cullet storage area. Looking towards the end of the trench drain.
Location: Between power plant and rail tracks.
Date/Time: March 1, 2022, 11:43AM

19: RIMG0021
Description: 55-gallon drum storing residual oil from the vaccum system. Note lack of secondary containment.
Location: Adjacent to power plant.
Date/Time: March 1, 2022, 11:45AM

20: RIMG0022
Description: Overview of trench drain which collects water that flows to Outfall 012.
Location: Between the administration building and the forming building.
Date/Time: March 1, 2022, 11:48AM

21: RIMG0023
Description: Chemical storage totes in the immediate vaccinity of Outfall 012 trench drain. Note lack of secondary containment.
Location: Between the administration building and the forming building.
Date/Time: March 1, 2022, 11:51AM

22: RIMG0024
Description: Outfall 012 sample location. There is a small amount of standing water in the trench within the manhole but no flow. This is also known as Manhole 33.
Location: Interior walkthrough.
Date/Time: March 1, 2022. 11:53AM

23: RIMG0025
Description: Duplicate photo of Outfall 012 sample location. There is a small amount of standing water in the trench within the manhole but no flow. This is also known as Manhole 33.
Location: Interior walkthrough.
Date/Time: March 1, 2022, 11:53AM

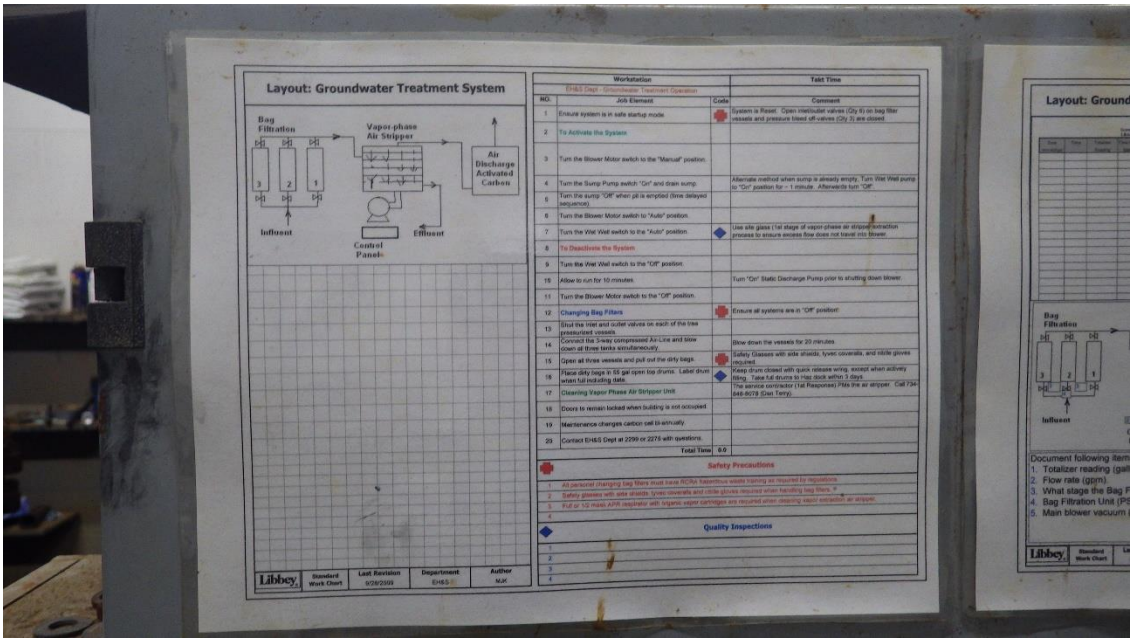
24: RIMG0026
Description: Outfall 003 with flow present. No visible oil, sheen, foam, or odor. Note presence of a weir.
Location: Exerior walkthrough along north side of plant, adjacent to Lucas County Creek.
Date/Time: March 1, 2022, 12:01PM

25: RIMG0027
Description: Flow from Outfall 003. Note presense of trash.
Location: Exerior walkthrough along north side of plant, adjacent to Lucas County Creek.
Date/Time: March 1, 2022, 12:01PM

26: RIMG0028
Description: Outfall 011 with flow present. No visible oil, sheen, foam, or odor.
Location: Exerior walkthrough along north side of plant, adjacent to Lucas County Creek.
Date/Time: March 1, 2022, 12:04PM

27: RIMG0029
Description: Outfall 012 with no flow present. Note oil sheet between end of pipe and sorbent sock.
Location: Exerior walkthrough along north side of plant, adjacent to Lucas County Creek.
Date/Time: March 1, 2022, 12:06PM

28: RIMG0030
Description: Sampling location for Outfall 011, which is the discharge point for groundwater treatment system.
Location: Groundwater treatment system shed.
Date/Time: March 1, 2022, 12:11PM



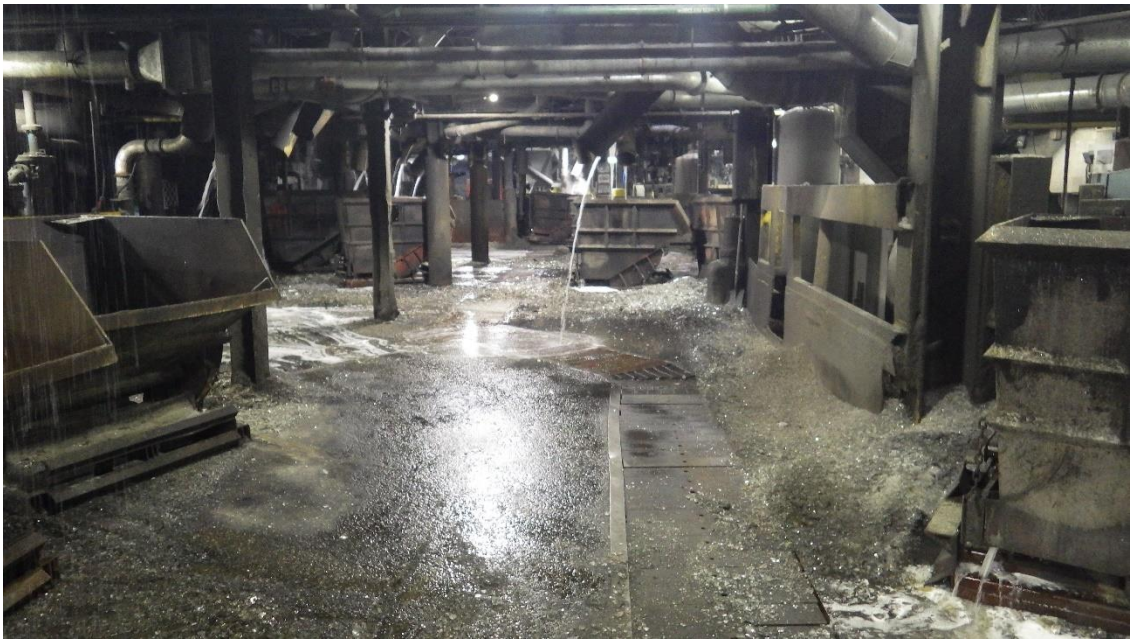
29: RIMG0031
Description: Groundwater treatment system schematic.
Location: Groundwater treatment system shed.
Date/Time: March 1, 2022, 12:12PM

30: RIMG0032
Description: Overview of groundwater treatment system.
Location: Groundwater treatment system shed.
Date/Time: March 1, 2022, 12:14PM

31: RIMG0033
Description: Overview of groundwater treatment system.
Location: Groundwater treatment system shed.
Date/Time: March 1, 2022, 12:14PM

32: RIMG0034
Description: Sweeper used for both indoor and outdoor floor cleaning.
Location: Interior walkthrough.
Date/Time: March 1, 2022, 12:19PM

33: RIMG0035
Description: Water draining from glass forming machines down to basement. Glass is caught in bins and water flows on the ground to a trench drain.
Location: Basement of hot production area.
Date/Time: March 1, 2022, 12:24PM



34: RIMG0036
Description: Overview of basement area and trench drain.
Location: Basement of hot production area.
Date/Time: March 1, 2022, 12:24PM

35: RIMG0037
Description: Oil water separator in recycled water treatment system.
Location: Cullet water pit and pump house.
Date/Time: March 1, 2022, 12:29PM

36: RIMG0038
Description: Duplicate photo of oil water separator in recycled water treatment system.
Location: Cullet water pit and pump house.
Date/Time: March 1, 2022, 12:29PM

37: RIMG0039
Description: Hypochlorite storage tank
Location: Cullet water pit and pump house.
Date/Time: March 1, 2022, 12:34PM

38: RIMG0040
Description: Discharge of recycled water into the City of Toledo sanitary sewer system. Note presence of foam.
Location: Directly outside of cullet water pit and pump house.
Date/Time: March 1, 2022, 12:36PM

39: RIMG0041
Description: Overivew of manhole in Photo 38 where recycled water is discharaged into the City of Toledo sanitary sewer system.
Location: Directly outside of cullet water pit and pump house.
Date/Time: March 1, 2022, 12:37PM