Ohio | Environmental Protection Agency

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

Re: Ottawa County
U.S. Gypsum
NPDES Permit

November 14, 2011

Mr. William C. St. Leger, Plant Manager
U. S. Gypsum Company
P. O. Box 121
Gypsum, Ohio 43433-0121

Dear Mr. St. Leger:

On October 12, 2011, an NPDES permit compliance inspection was made at US Gypsum. Mr. Andy Cvitkovich, Engineering Manager, was present and provided information on plant operations, and escorted me to the new clarifier and outfalls. We also reviewed required actions contained in the 2008 Director's Final Findings and Orders (DFFO's) to address past compliance issues. My comments and recommendations are as follows:

The DFFO's recommended near term improvements to maintain NPDES compliance and long term actions to increase efficiency of treatment operations. A summary of these recommendations and current status as provided is as follows:

Compliance:

1) Install Additional aerators in Cell 1 - Completed 2008
2) Setup Aerator O & M Program - Completed 2008
3) Install Floating Baffle in Lagoon Cell No. 2 - Completed 2008
4) Wet Well Operations Improvement – Completed and abandoned
5) Install Replacement Primary Clarifier – 2011

Efficiency:

6) Install Replacement Wet Well - 2011
7) Add Fourth Lagoon – Determined not to be necessary
8) Dredge Cell 2 and 3- Determined not necessary at this time due to improved efficiency of new primary clarifier.
9) Dispose of Sludge Geotubes – Completed 2009. Barnes Nursery handling current sludge disposal.
10) Install Replacement Filter Press – Current press still operational, but replacement is in long term plan.
11) Replace Sludge Silos with Gravity Thickeners – One installed and currently in process of replacing the other.

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12) Replace Existing Aerators with Updated Version – Three new aerators in cell #1 providing adequate aeration. Improved O&M increasing lifespan of remaining units, and they will be replaced as needed.

These comments reflect information provided at the time of the inspection and are not to be construed as a statement of compliance with the DFFO's. Final obligations are provided in Section **VI. Termination** of the Orders and require a written certification statement to be submitted to the Ohio EPA that all obligations have been performed.

NPDES compliance since April 1, 2009, the effective date of the renewal was reviewed and indicated several minimum pH violations in June 2010 and two in July 2010. These violations were attributed to algae buildup on the pH probe and were addressed through daily cleaning of the probe. Since that time USG has been in full compliance with all permit limitations.

Plant operations have stabilized since our last visit with the commercial roofing board line doing well. The new primary clarifier brought online in January was the centerpiece of treatment improvements, and is operating very efficiently. Noticeably missing, were any objectionable odors which plagued the old unit. All the aerators were in operation in all three lagoons, and a clear effluent was observed being discharged into the bay through Outfall 001. Flow was being controlled by a valve restrictor. Outfall 005, which is a stormwater discharge, was also clear.

We appreciate USG's efforts in bringing this facility into compliance, and look forward to your continuing cooperation in the future. If any of the above is in error, or you have any questions, please call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us

Sincerely,

Richard A. Zuzik, MSE
Division of Surface Water

/lr

pc: Mr. Andy Cvitkovich, Engineering Manager, U.S. Gypsum
DSW-NWDO File