



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korteski, Director



1IS0002020081218

CLARK

CASCADE CORP

WALBRIDGE, MATT 2008/12/18



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 18, 2008

RE: NPDES Compliance Inspection and
Notice of Violation

Ms. Jennifer Boyd
Cascade Corporation
2501 Sheridan Avenue
Springfield, OH 45505

Dear Ms. Boyd:

On November 5, 2008 I met with you to conduct an inspection of your facility's contaminated groundwater treatment system. A review of your discharge monitoring reports since my previous inspection revealed the following violations. Shaded values exceed the effluent limits but are considered by the permit to be compliant.

	Date	Parameter	Limit Type	Limit	Reported Value
2007	August 31	1,1,1-Trichloroethane	Daily Maximum	10 ug/l	92.7 ug/l
	August		Monthly Average	5 ug/l	92.7 ug/l
	August 31		Daily Maximum Loading	0.02 kg/day	0.02032 kg/day
	August		Monthly Average Loading	0.01 kg/day	0.02032 kg/day
	August 31	Trichloroethylene	Daily Maximum	10 ug/l	36.2 ug/l
	August		Monthly Average	5 ug/l	36.2 ug/l
	August 31	1,1-Dichloroethane	Daily Maximum	10 ug/l	16.1 ug/l
	August		Monthly Average	5 ug/l	16.1 ug/l
2008	March 19	Chromium, Dissolved Hexavalent	Daily Maximum	1.8 ug/l	5.2 ug/l
	March		Monthly Average	1.3 ug/l	5.2 ug/l
	March		Monthly Average Loading	0.003 kg/day	0.00373 kg/day
	April 21		Daily Maximum	1.8 ug/l	5.2 ug/l
	April		Monthly Average	1.3 ug/l	5.2 ug/l
	April		Monthly Average Loading	0.003 kg/day	0.00387 kg/day
	May 12		Daily Maximum	1.8 ug/l	5.2 ug/l
	May		Monthly Average	1.3 ug/l	5.2 ug/l
	May		Monthly Average Loading	0.003 kg/day	0.0036 kg/day
	September 29		Daily Maximum	1.8 ug/l	8.74 ug/l
	September		Monthly Average	1.3 ug/l	8.74 ug/l
	September 29		Daily Maximum Loading	0.004 kg/day	0.00593 kg/day
	September		Monthly Average Loading	0.003 kg/day	0.00593 kg/day
	October 16		Daily Maximum	1.8 ug/l	6.6 ug/l
October	Monthly Average	1.3 ug/l	6.6 ug/l		
October 16	Daily Maximum Loading	0.004 kg/day	0.00418 kg/day		
October	Monthly Average Loading	0.003 kg/day	0.00418 kg/day		

Ms. Jennifer Boyd
December 18, 2008
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The 1,1,1-Trichloroethane violation in August 2007 was reported to our Emergency Response Initial Pollution Incident Reporting system and explained as being caused by a well pump outage. This presumably was the cause for the other VOC violations that month. Since it appears that the system has returned to producing an effluent that is compliant for the parameters for which it was designed, no further response is necessary. However, I am concerned about the amount of Dissolved Hexavalent Chromium that started to exceed the water quality-based effluent limits beginning in March 2008 and that appears to be continuing. My thought is that, since November 2006 when the chromium recovery wells were shut down (along with the attendant hexavalent chromium treatment system), groundwater contaminated with hexavalent chromium is now being pulled toward and into the VOC recovery wells that discharge through outfall 002. The air stripper does not remove hexavalent chromium.

Cascade can not continue to allow groundwater contaminated with hexavalent chromium to be discharged in exceedence of its NPDES permit limits. It seems that either the chromium recovery well and treatment system needs to be brought back into operation or new treatment will need to be provided for the air stripper discharge. It is very important that Cascade explain how it plans to ensure compliance; please inform me how you will be addressing this significant issue.

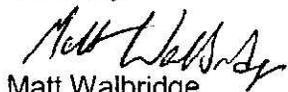
Also, please note that you are required by Part III, Item 12 of your permit to provide notification within 24 hours of becoming aware of violations. I have no record of you submitting notification for the hexavalent chromium violations in September. Please ensure any future violations are reported properly.

There were two other findings that necessitate your attention. The first is that I need you to explain the inactive status of one of the three air strippers. I do not recall noting its inactive status in previous inspections and I was unable to find a record of when it ever stopped being used (or if it was ever in use). Although effluent compliance can be pointed to as justification for not using the unit, I am interested in hearing your explanation for its inactive status.

The second finding is that necessitates your attention is that I observed a significant amount of lime build-up in both the pipe connection between the lime sedimentation tank and the flume and in the flume itself. The build-up in the pipe is causing turbulent conditions through the flume and the build-up in the flume is affecting its critical dimensions upon which the flume's readings are based. I believe both these conditions may be leading to inaccurate flow measurements. Please address the cleaning needs of these components including the steps that will be taken to ensure they don't develop in the future.

If you have any questions concerning this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,



• Matt Walbridge
Environmental Specialist
Division of Surface Water

ENCLOSURES

CC: Alison Hudson – EHS Technology Group



Ohio Environmental Protection Agency

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number 1IS00020*DD	NPDES Number OH0085715	Inspection Date 11-5-08	Inspection Type C	Inspector S	Facility Type 2
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Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Cascade Corporation 2501 Sheridan Avenue Springfield, OH 45505	1245	August 1, 2004
	Exit Time	Permit Expiration Date
	1330	July 31, 2009
Name(s) and Titles of On-Site Representative(s)	Phone Number(s)	
Jennifer Boyd - Quality Assurance / Environmental	(937) 327-0383	
Name, Title and Address of Responsible Official:	Phone Number	
Mr. Dave Geurts - Plant Manager Cascade Corporation 2501 Sheridan Avenue Springfield, OH 45505	(937) 327-0300	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE = Not Evaluated)

S Permit	NE Flow Measurement	NA Pretreatment
S Records/Reports	NA Laboratory	NA Compliance Schedules
M Operations & Maintenance	M Effluent/Receiving Waters	NA Collection System
M Facility Site Review	S Sludge Storage/Disposal	NA Other
U Self-monitoring Program		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Lime precipitation filters were cleaned/replaced in October 2008.
- One of the three stripper units was not operating
- Still noticeable amounts of lime precipitant in the bottom of the receiving stream
- There is a noticeable amount of bright green algae in the receiving stream.
- The stripper building had a small leak that gets outside the building.
- The flume was clogged with restricted flow between the lime tanks and the flume.
- See inspection letter for more details and other findings.

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 12-18-08
Name and Signature of Reviewer(s) Marty G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 12/18/08

