



**Environmental  
Protection Agency**

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



\*11S0002020100507\*

CLARK

CASCADE CORP

WALBRIDGE, MATT 2010/05/07

**Environmental  
Protection Agency**

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

May 6, 2010

RE: NPDES Compliance Inspection and  
Notice of Violation

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

Dear Ms. Boyd:

On April 20<sup>th</sup> I met with you to conduct an inspection of your facility relative to its NPDES-permitted discharge to waters of the state. A review of your discharge monitoring reports since my previous inspection revealed the following violations for outfall 002:

Date	Parameter	Limit Type	Limit	Reported Value
2009	February 11	Daily Maximum	45 mg/l	83 mg/l
	February	Total Suspended Solids Monthly Average	30 mg/l	83 mg/l
	March	Total Suspended Solids Monthly Average	30 mg/l	40 mg/l
	April	1,1,1-Trichloroethane Monthly Average	5 ug/l	5.5 ug/l

Cascade also failed to monitor during November 2009 when it discharged during the first fifteen days of the month. Since discontinuation of discharge was not anticipated and I have every reason to believe sampling would have otherwise occurred, I do not consider this to be a violation of your NPDES permit requirements.

**Hexavalent Chromium**

Cascade continues to be in violation of Part II, Item F of its NPDES permit which requires Hexavalent Chromium to be analyzed using the lowest available detection method currently approved in 40 CFR, Part 136. Cascade continues to analyze using a colorimetric method whereas the ion chromatographic (IC) method provides the lowest detection limit. You have indicated that the IC method is not available through the local lab Cascade is currently using and the 24-hour hold time complicates having the sample analyzed by the lab's California facility.

The draft renewal of your NPDES permit has been in public notice since October 20, 2009 and you have indicated your intention to submit a request for an increase in permitted loading of hexavalent chromium. If this request and Antidegradation Addendum is not submitted by May 28, 2010, I plan to recommend the draft NPDES permit be issued as a final action.



Ms. Jennifer Boyd  
May 6, 2010  
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### Lime Removal Tanks

At the time of the inspection the lime removal tanks were being cleaned. The burlap screens were removed and placed in a roll-off dumpster, the accumulated sediment in the bottom of the tanks was shoveled out and placed in the dumpster and the pipe connections between the tanks and the discharge flume were cleaned of lime build-up using a water jet. Additional limestone rock was deposited at the outfall to provide better access for maintenance equipment. With no discharge occurring, the receiving stream was essentially dry.

### New Recovery Well

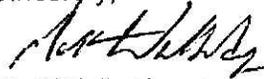
You indicated that a new recovery well is anticipated in the foreseeable future. This well would be fed to the existing unused air stripper. I would like for you to determine if the lime removal tanks will be able to keep lime deposits from forming beyond the immediate area of the discharge into the receiving stream. If additional capacity or different type of capture is determined to be necessary to accommodate the new well, then it will be necessary obtain a Permit to Install prior to bringing the new well on-line. Please submit your evaluation of the potential need for lime capture upgrades by June 14, 2010.

### Total Dissolved Solids

Finally, I am interested in knowing the concentration of total dissolved solids in the discharge through outfall 002. Please arrange to analyze this parameter in the collection of your next monthly sample and submit a scanned copy of the chain of custody and analytical report to me via e-mail.

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

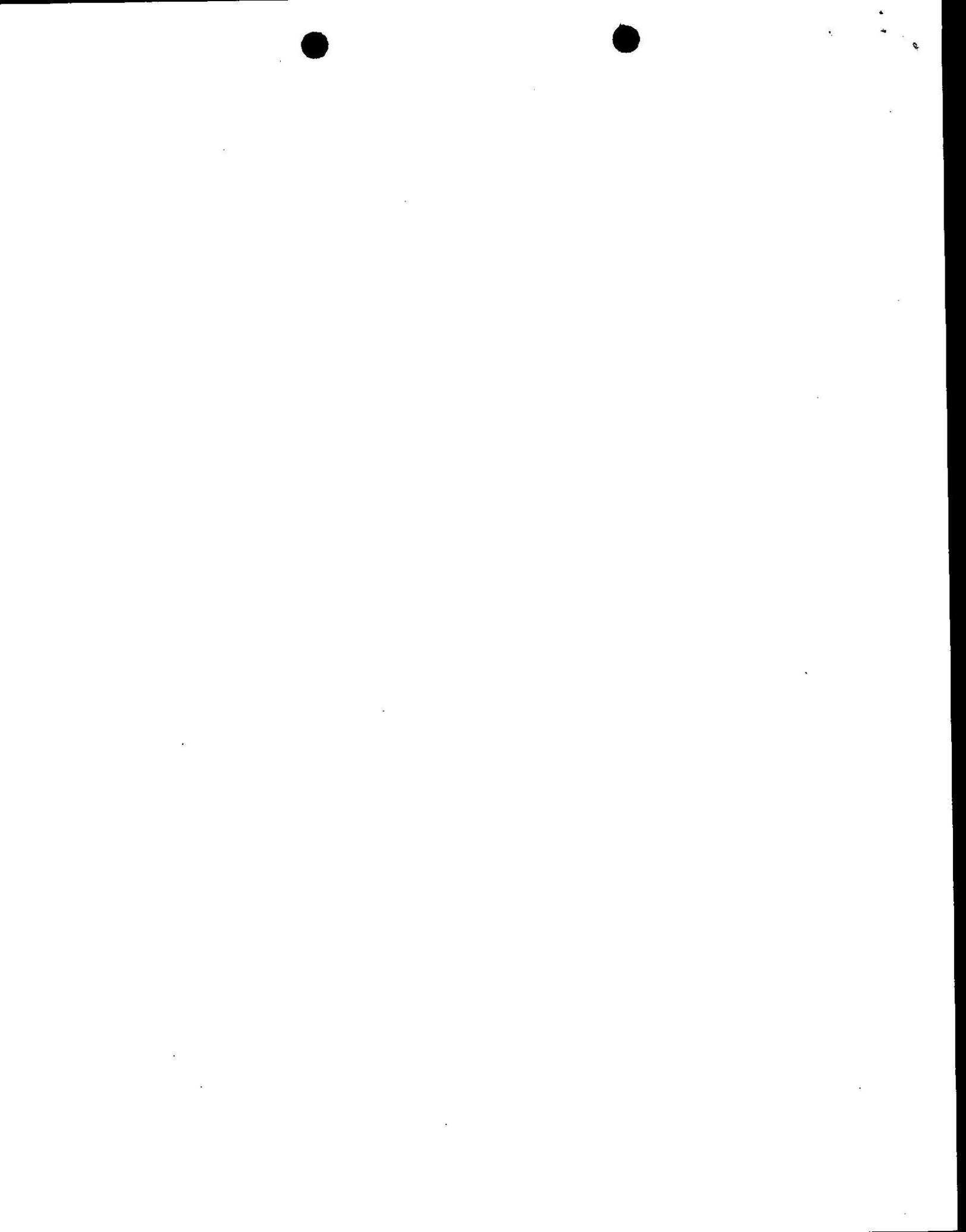
Sincerely,



Matt Walbridge  
Division of Surface Water

ATTACHMENT

CC: Alison Hudson – EHS Technology Group, LLC (scanned copy via e-mail)





## Section A: National Data System Coding

Permit Number <b>1IS00020*DD</b>	NPDES Number <b>OH0085715</b>	Inspection Date <b>4-20-10</b>	Inspection Type <b>C</b>	Inspector <b>S</b>	Facility Type <b>2</b>
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## Section B: Facility Data

Name and Location of Facility Inspected:  <b>Cascade Corporation 2501 Sheridan Avenue Springfield, OH 45505</b>	Entry Time	Permit Effective Date
	<b>1300</b>	<b>August 1, 2004</b>
	Exit Time	Permit Expiration Date
	<b>~1415</b>	<b>July 31, 2009</b>

Name(s) and Titles of On-Site Representative(s)	Phone Number(s)
<b>Jennifer Boyd – Quality Assurance / Environmental</b>	<b>(937) 327-0336</b>
<b>Alison Hudson – EHS Technology Group, LLC</b>	<b>(937) 865-3942</b>
<b>Holly Padovani – EHS Technology Group, LLC</b>	<b>(937) 865-3869</b>

Name, Title and Address of Responsible Official:	Phone Number
<b>Dave Geurts – Plant Manager Cascade Corporation 2501 Sheridan Avenue Springfield, OH 45505</b>	<b>(937) 327-0300</b>

## Section C: Areas Evaluated During Inspection

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

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

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

- Lime precipitation filters were in the process of being replaced and the tanks were being cleaned of accumulated sediment.
- One of the three stripper units is not operating – it is reserved for use when the new well is installed.
- With no discharge, there is no flow in the stream. Green algae were drying out in the stream bed.
- Lime and burlap was deposited in a lined roll-off dumpster. Lime is shoveled from the bottom of the tanks into the dumpster.
- See inspection letter for more details and other findings.

Name and Signature of Inspector(s)  Matt Walbridge	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6095</b>	Date <b>5-6-10</b>
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Name and Signature of Reviewer(s)  Martyn G. Burt	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6034</b>	Date <b>5/7/10</b>
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