



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

March 19, 2008

RE: WAYNE COUNTY
AC PRODUCTS
NPDES 3100264

Mr. Ervin Shrock
AC Products, Inc.
4299 South Apple Creek Road
Apple Creek, OH 44606

Dear Mr. Shrock:

On March 11, 2008, this writer met with you and Mr. Dave Reader to conduct an inspection of the industrial and sanitary wastewater treatment plants and to assess the industrial wastewater re-use system. The inspection revealed the following:

- 1) It is our understanding that AC Products has been under new ownership since October 2007. Mr. Dave Reader represented the new owners during the inspection. Since going under new ownership, the facility has decreased production and the number of employees dropped from 100 to about 40 to 42 with only one shift in operation. At the request of Mr. Reader, enclosed in this letter are copies of this office's July 27, 2005 and February 28, 2006, inspection letters; August 3, 2006, violation letter; and the Permit-to-Install issued for the industrial wastewater treatment system.
- 2) An expanded industrial wastewater re-use system had been proposed by the previous lab manager. According to you, the re-use system was never finalized and the project was abandoned.
- 3) You inquired about the need for a storm water permit. Upon inspection of the facility, it appears stormwater runoff from the facility may be subject to the General Storm Water NPDES Permit for Industrial Activities. The materials stored behind the facility qualify you for the General Storm Water NPDES Permit. You must assure that storm water runoff from the property complies with the requirements of the General Storm Water NPDES Permit.

To obtain coverage, you must develop a Storm Water Pollution Prevention Plan (SWP3) and submit the enclosed Notice of Intent (NOI). A vicinity map showing the location of your site on an 8.5" x 11" paper and a check for the permit fee must accompany the NOI. Send completed materials to Ohio EPA Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049.

Your facility may not be required to obtain a General Storm Water NPDES permit if you can certify a condition of no exposure exists. A guidance manual regarding "no exposure" can be downloaded from the United States Environmental Protection Agency website at <http://epa.gov/npdes/pubs/noxguide.pdf>. If you qualify for "no exposure," you will be required to submit a No Exposure Certification (available at www.epa.state.oh.us/dsw/storm/index.html) rather than submitting an NOI. Like the NOI, the No Exposure Certification must be resubmitted every five years.

The extra equipment and material stored behind the building voids you from being able to claim that a condition of "no exposure" exists at your facility. This office is suggesting you move all of the equipment and materials indoors or properly dispose of it at a facility certified to accept this equipment. This work is expected to be completed within a reasonable timeframe, but no later than 30 days from the date of this letter. As such, you are directed to submit the NOI or No Exposure Certification no later than April 21, 2008.

- 4) The sanitary sewer system was producing what appeared to be a satisfactory quality effluent. The mixed liquor in the aeration tank was a light brown color with minor foam being produced in sections of the tank. The tanks had good air circulation with appropriate rollover noted. The settling tank had scum located on the surface. This would indicate a clog in an air line or insufficient submergence of the skimmer head. In addition, the weirs on the settling tank were full of solids. You indicated that the clarifier walls are routinely scrapped down at a minimum rate of once every two weeks. The sludge return line for this system was not in operation at the time of the inspection. A sludge return line is a critical component of an extended aeration plant. The sludge return line sends concentrated solids to the aeration tank to maintain a good solids balance in the extended aeration system.

The dosing station and sand filters appeared to be in good condition. The south sand filter was in operation at the time of the inspection. The chlorination tank was not visually seen due to being buried by deep snow. Our records indicate the chlorination point was at the distribution box to the sand filters. If this is accurate, we recommend you utilize the chlorine contact tank located after the sand filters. The dechlorination tank was inspected and found to be in good condition.

- 5) The facility compliance record from the period of January 1, 2006 through March 1, 2008, is attached for your review. The fecal violations accrued by the system may be from improper chlorination. During summer months (May through October) you must ensure the chlorination system is functioning properly in order to meet the fecal limits in your NPDES permit. The chlorination tank should be checked at least weekly to make sure it is well stocked with chlorine tablets.
- 6) At the time of the inspection, the industrial wastewater treatment plant appeared to be in good condition. The effluent pipe from the maintenance building to the exterior settling tanks was covered by bales of straw in plastic bags. You indicated the bales were placed there to prevent the line from freezing. The bales of straw do not appear to be the best practice available for achieving the desired insulation. Please review alternate methods of insulation for this pipe and remove the bales of straw as soon as possible to prevent the bags from opening into the settling tanks. The north tank was full and the system was not discharging. It is understood the tanks were last pumped on January 18, 2008, by Kline Environmental.

The industrial wastewater treatment system has a design capacity of 3765 gpd and the operations at the facility must not hydraulically overload the plant. If it is anticipated that production will be increasing, the industrial wastewater system must add additional treatment to reduce the concentration so the plant is operating within the loading limits in the permit or revisit the industrial

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water reuse system. The previous NPDES permit renewal addressed obtaining additional loading for zinc. The antidegradation review was incomplete based on the prior operator pursuing a wastewater recycle system. If you anticipate production will be increasing, you must contact this office to review your options.

Should you have any comments or questions regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW:bo

attachments

cc: Mr. Dave Reader, AC Products

ec: Rich Blasick, P.E., DSW, NEDO

File: Industrial/AC Products/Permit Compliance

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Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Total Suspended Solids	1D Qty	0.26	.26565	5/18/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.00321	1/25/2006
001	Zinc, Total (Zn)	1D Conc	450	885.	5/18/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.01237	5/18/2006
001	Zinc, Total (Zn)	1D Conc	450	636.	5/31/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.00348	5/31/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.0053	6/6/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.00276	6/13/2006
001	Zinc, Total (Zn)	1D Qty	0.0025	.00451	6/15/2006
002	CBOD 5 day	1D Conc	15	19.	7/17/2006
002	CBOD 5 day	30D onc	10	16.	9/1/2007
002	CBOD 5 day	1D Conc	15	16.	9/27/2007
002	Dissolved Oxygen	1D Conc	5.0	4.5	1/24/2006
002	Fecal Coliform	1D Conc	2000	2000.	7/18/2006
002	Fecal Coliform	30D onc	1000	1600.	6/1/2007
002	Fecal Coliform	30D onc	1000	1600.	7/1/2007
002	Nitrogen, Ammonia (NH3)	1D Conc	6.0	8.9	1/24/2006
002	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.585	6/1/2006
002	Nitrogen, Ammonia (NH3)	1D Conc	3.0	9.65	6/26/2006
002	Nitrogen, Ammonia (NH3)	1D Qty	0.021	.03353	6/26/2006
002	Nitrogen, Ammonia (NH3)	30D Conc	4.0	5.45	2/1/2007
002	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.39	9/1/2007
002	Total Suspended Solids	30D Conc	12	12.5	6/1/2006
002	Total Suspended Solids	1D Conc	18	19.	6/19/2006
002	Total Suspended Solids	1D Conc	18	19.	6/26/2006
002	Total Suspended Solids	30D Conc	12	13.	7/1/2006