



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

October 15, 2009

RE: ASHTABULA COUNTY PORT AUTHORITY  
PERMIT NO. 3IB00021  
ASHTABULA COUNTY

Mr. John Palo, President  
Ashtabula County Port Authority  
Jefferson, Ohio 44047

Dear Mr. Palo:

On September 9, 2009, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by William Schuler, Praxair Plant Engineer, Mr. Toby Workman, Consultant, and you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment plant along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

The following items were noted/discussed during the inspection:

1. The facility's NPDES permit became effective on August 1, 2007.
2. The Port Authority pumps approximately 15 MGD of water to existing businesses in the area.
3. The Port Authority supplies 8.5 MGD to Praxair. The remaining water goes to Millennium and Crystal Global.
4. The Port Authority also supplies water to the local fire hydrant system. Approximately 7 facilities are on the system.
5. The wastewater treatment system is currently treating 254,000 gallons per month of backwash.
6. The Port Authority is going to replace four valves in the oily waste treatment system to prevent bypassing during backwash operations. The intent is to eliminate untreated process water from discharging to outfall 3IB00021007.
7. Praxair performs the NPDES permit sampling for the Port Authority.
8. The EA Group performs the lab analysis.
9. The EA Group provides Praxair with the sample containers with preservative.
10. The samples are packed in ice for shipment. The EA Group picks up the samples on the same day they are collected.
11. All fly ash/contaminated soils have been remediated/removed from the facility.
12. The ash pond is not being utilized. The material in the ash pond was tested and disposed in a landfill.
13. The two intake lines at the facility are both approximately 70% plugged. Currently contractors are unplugging one intake line.

14. The Port Authority is working with Johnson Control to study the feasibility of restarting the facility.
15. Biomass is being proposed to run the boilers.
16. As we discussed, the loading violations outlined below are suspect. It appears that flow may have been reported in gallons per day instead of Million gallons per day as required by the facility's NPDES permit. This should be verified and the data resubmitted if necessary.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2007 through August 31, 2009 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
007	00530	Total Suspended Solids	30D Qty	3.41	#####	8/1/2007
007	00550	Oil and Grease, Total	30D Qty	1.71	#####	8/1/2007
007	00530	Total Suspended Solids	1D Qty	11.4	#####	8/31/2007
007	01119	Copper, Total Recoverable	1D Qty	0.0043	34.8503	8/31/2007
007	00550	Oil and Grease, Total	1D Qty	2.28	#####	8/31/2007
007	00530	Total Suspended Solids	30D Qty	3.41	3785000	10/1/2007
007	00530	Total Suspended Solids	1D Qty	11.4	3785000	10/4/2007
007	01119	Copper, Total Recoverable	1D Qty	0.0043	.46328	12/6/2007
007	00530	Total Suspended Solids	30D Qty	3.41	613170.	1/1/2008
007	00530	Total Suspended Solids	1D Qty	11.4	613170.	1/3/2008
007	00530	Total Suspended Solids	30D Qty	3.41	1112790	2/1/2008
007	00550	Oil and Grease, Total	30D Qty	1.71	500755.	2/1/2008
007	00530	Total Suspended Solids	1D Qty	11.4	1112790	2/8/2008
007	00550	Oil and Grease, Total	1D Qty	2.28	500755.	2/8/2008
007	00530	Total Suspended Solids	30D Qty	3.41	1703250	5/1/2008
007	00550	Oil and Grease, Total	30D Qty	1.71	1328535	5/1/2008
007	00530	Total Suspended Solids	1D Qty	11.4	1703250	5/8/2008
007	00550	Oil and Grease, Total	1D Qty	2.28	1328535	5/8/2008
007	00530	Total Suspended Solids	30D Qty	3.41	1703250	7/1/2008
007	00550	Oil and Grease, Total	30D Qty	1.71	1362600	7/1/2008
007	00530	Total Suspended Solids	1D Qty	11.4	1703250	7/8/2008
007	00550	Oil and Grease, Total	1D Qty	2.28	1362600	7/8/2008
007	00400	pH	1D Conc	6.5	6.41	2/5/2009
007	00530	Total Suspended Solids	30D Qty	3.41	800527.	3/1/2009
007	00530	Total Suspended Solids	1D Qty	11.4	800527.	3/5/2009
007	01119	Copper, Total Recoverable	1D Qty	0.0043	3.33553	3/5/2009

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### Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
007	01119	Copper, Total Recoverable	1/Quarter	1	0	03/01/2008

It should be noted that this office has no record of receiving the September 2007 discharge monitoring report. This data should be submitted immediately.

**Please notify this office in writing, within 14 days receipt of this letter your intention to resolve item 16. The letter should include dates, either actual or proposed, for completion of the actions.**

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS:ddw