



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

October 4, 2007

RE: CANTEX INC.  
3IF00024 \*FD  
PORTAGE COUNTY

Mr. Don Langley, Plant Manager  
CANTEX INC.  
11444 Chamberlain Road, Suite #1  
Aurora, OH 44202

Dear Mr. Langley:

On September 27, 2007, this writer conducted a compliance evaluation inspection of your facility, for the purpose of determining compliance with the above referenced NPDES permit. This was also a follow-up to an inspection letter dated October 2, 2006, and a letter dated November 22, 2006. John Gerbec, Maintenance Manager, CANTEX INC., accompanied me during the inspection. You were present during the pre-inspection meeting. A summary of the inspection is presented below.

Inspection Observations

- The drain in the oil storage area has been cemented shut, as requested in my last inspection.
- There is no dechlorination unit after chlorination for the sewage treatment facility.
- The sand in the surface sand filter for the treatment plant appears to be larger than is required. It shall be clean and washed with an effective size between 0.4 and 1.0 mm, with a uniformity coefficient not greater than 3.0. Sand shall be adequate to provide sufficient tertiary treatment to achieve established effluent limits. The effective size is that size of grain in a sample of sand above which 90 percent by weight is larger or retained by the sieve, and 10 percent is smaller passed by the sieve 22. The uniformity coefficient is the theoretical size in millimeters of the sieve that would pass 60 percent of the sample, divided by the effective size. Please determine from the contractor, who recently replaced the sand, the size of the sand particles.
- Outfalls 001 and 002 were under water at the discharge into the unnamed tributary.
- The discharge from the sand filters as seen in the adjacent sampling crock was clear with no visual problems.
- The sampling location for outfall 602 is being done by composite sample by running a sampling tube down a floor drain. This may not be a good location as Mr. Gerbec could not be certain that the drain did not contain some other flow other than process overflow.

Outstanding items requested in our letter dated November 22, 2006, are the following:

- 1) Storm water Pollution Prevention Plan.
- 2) Confirmation that the appropriate sand was used in the surface sand filter.
- 3) Installation of a dechlorination unit in the chlorine contact chamber (need approved PTI).

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Additionally, to date we have not received the permit-to-install (PTI) application requested for the recycle treatment system.

A review of the compliance history for your facility with National Pollutant Discharge Elimination System (NPDES) permit 31F00024, for the time period of August 2006 through August 2007 indicates the following violations:

Numeric Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	00530	Total Suspended Solids	1D Conc	10.3	13.	11/8/2006
602	00530	Total Suspended Solids	1D Conc	10.3	20.	11/28/2006
602	00530	Total Suspended Solids	1D Conc	10.3	32.	12/21/2006
602	00530	Total Suspended Solids	1D Conc	10.3	47.	12/28/2006
602	00530	Total Suspended Solids	1D Conc	10.3	41.	1/5/2007
602	00530	Total Suspended Solids	1D Conc	10.3	15.	1/23/2007
602	00530	Total Suspended Solids	1D Conc	10.3	164.	2/6/2007
602	00530	Total Suspended Solids	1D Conc	10.3	29.	3/6/2007
602	00530	Total Suspended Solids	1D Conc	10.3	194.	3/20/2007
602	00530	Total Suspended Solids	1D Conc	10.3	395.	3/27/2007
602	00530	Total Suspended Solids	1D Conc	10.3	829.	4/3/2007
602	00310	Biochemical Oxygen Dem	1D Conc	14.1	17.	4/3/2007
602	00530	Total Suspended Solids	1D Conc	10.3	573.	4/10/2007
602	00530	Total Suspended Solids	1D Conc	10.3	404.	4/17/2007
602	00530	Total Suspended Solids	1D Conc	10.3	593.	4/24/2007
602	00530	Total Suspended Solids	1D Conc	10.3	184.	5/3/2007
602	00552	Oil and Grease, Hexane	1D Conc	15.8	31.3	5/3/2007
602	00530	Total Suspended Solids	1D Conc	10.3	181.	5/16/2007
602	00310	Biochemical Oxygen Dem	1D Conc	14.1	15.	5/16/2007
602	00530	Total Suspended Solids	1D Conc	10.3	49.	5/23/2007
002	50060	Chlorine, Total Residu	1D Conc	0.019	.08	6/5/2007
602	00530	Total Suspended Solids	1D Conc	10.3	191.	6/5/2007
602	00530	Total Suspended Solids	1D Conc	10.3	148.	6/12/2007
602	00530	Total Suspended Solids	1D Conc	10.3	64.	6/19/2007
002	50060	Chlorine, Total Residu	1D Conc	0.019	.08	7/10/2007
602	00530	Total Suspended Solids	1D Conc	10.3	29.	7/10/2007
602	00530	Total Suspended Solids	1D Conc	10.3	447.	7/24/2007
002	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/2/2007
602	00530	Total Suspended Solids	1D Conc	10.3	18.	8/13/2007
602	00310	Biochemical Oxygen Dem	1D Conc	14.1	306.	8/13/2007
602	00530	Total Suspended Solids	1D Conc	10.3	39.	8/20/2007
602	00530	Total Suspended Solids	1D Conc	10.3	32.	8/27/2007

Frequency Violations

<b>Violation Date</b>	<b>Station</b>	<b>Reporting Code</b>	<b>Parameter</b>	<b>Sample Frequency</b>	<b>Expected</b>	<b>Reported</b>
12/1/2006	002	00530	Total Suspended Solids	1/Quarter	1	0
12/1/2006	002	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0
12/1/2006	002	80082	CBOD 5 day	1/Quarter	1	0
12/1/2006	002	00400	pH	1/Quarter	1	0
12/1/2006	002	00300	Dissolved Oxygen	1/Quarter	1	0
3/1/2007	002	00530	Total Suspended Solids	1/Quarter	1	0
3/1/2007	002	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0
3/1/2007	002	80082	CBOD 5 day	1/Quarter	1	0
3/1/2007	002	00400	pH	1/Quarter	1	0
3/1/2007	002	00300	Dissolved Oxygen	1/Quarter	1	0
4/1/2007	002	00530	Total Suspended Solids	1/Month	1	0
4/1/2007	002	00610	Nitrogen, Ammonia (NH3)	1/Month	1	0
4/1/2007	002	80082	CBOD 5 day	1/Month	1	0
4/1/2007	002	00400	pH	1/Month	1	0
4/1/2007	002	00056	Flow Rate	1/Week	1	0
4/8/2007	002	00056	Flow Rate	1/Week	1	0
4/15/2007	002	00056	Flow Rate	1/Week	1	0
4/22/2007	002	00056	Flow Rate	1/Week	1	0
4/1/2007	002	00300	Dissolved Oxygen	1/Month	1	0
4/1/2007	602	50050	Flow Rate	1/Week	1	0
4/8/2007	602	50050	Flow Rate	1/Week	1	0
4/15/2007	602	50050	Flow Rate	1/Week	1	0
4/22/2007	602	50050	Flow Rate	1/Week	1	0
4/1/2007	602	00552	Oil and Grease, Hexane	1/Week	1	0
4/8/2007	602	00552	Oil and Grease, Hexane	1/Week	1	0
4/15/2007	602	00552	Oil and Grease, Hexane	1/Week	1	0
4/22/2007	602	00552	Oil and Grease, Hexane	1/Week	1	0
5/1/2007	002	00530	Total Suspended Solids	1/Month	1	0
5/1/2007	002	00610	Nitrogen, Ammonia (NH3)	1/Month	1	0
5/1/2007	002	31616	Fecal Coliform	1/Month	1	0
5/1/2007	002	80082	CBOD 5 day	1/Month	1	0
5/1/2007	002	50060	Chlorine, Total Residu	1/Month	1	0
5/1/2007	002	00400	pH	1/Month	1	0
5/1/2007	002	00056	Flow Rate	1/Week	1	0
5/15/2007	002	00056	Flow Rate	1/Week	1	0
5/22/2007	002	00056	Flow Rate	1/Week	1	0
5/1/2007	002	00300	Dissolved Oxygen	1/Month	1	0
5/1/2007	602	50050	Flow Rate	1/Week	1	0
5/8/2007	602	50050	Flow Rate	1/Week	1	0
5/15/2007	602	50050	Flow Rate	1/Week	1	0
5/22/2007	602	50050	Flow Rate	1/Week	1	0

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When your facility incurs a violation of the effluent limitations you are required to notify this office as outlined under Part III, Section 12, Non-compliance Notification.

Please be advised that violations of an NPDES permit are subject to an enforcement action pursuant to Ohio Revised Code 6111. Your company is subject to civil and monetary penalties for violations of your permit. **Your facility is in substantial noncompliance.** You stated during our meeting that you would be submitting a letter addressing the issues raised above. To date we have not received this letter.

This is the third notification that your facility is in noncompliance with the NPDES permit since October 2006, as well as not providing requested information. Please be advised that we are initiating the process to request an enforcement action. If you should have any questions concerning the above, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Engineer  
Division of Surface Water

PPR/mt

File: Industrial Permit/Compliance