

**Environmental  
Protection Agency**

Governor  
Lt. Governor  
Director

August 31, 2011

RE: DETREX CORP. CHEMICALS DIVISION  
OHIO EPA PERMIT 3IF00017  
ASHTABULA TWP., ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. Thomas W. Steib, Operations Manager  
Detrex Corporation - Chemicals Division  
1100 N. State Road  
Ashtabula, Ohio 44005

Dear Mr. Steib:

On August 30, 2011, a limited scope site inspection was conducted at the above referenced facility at 1100 North State Road. The inspection was conducted by John Schmidt of this office, with you representing Detrex Corporation Chemicals Division (Detrex) during the inspection. Others from Detrex, Ohio EPA's Northeast District Office, the Ashtabula Township Fire Department, and U.S. EPA were onsite for an unrelated air complaint inspection which will be addressed under separate cover. The purpose of the surface water inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on June 14, 2011.

**Observations**

The following concerns were noted during the inspection:

1. The headworks sand filter was found to contain vegetation. Plant material must be periodically removed from the filters and disposed of as a solid waste.
2. Surface sand filters were not found in acceptable condition. The south filter bed was found to contain dry sludge, and the north bed was full of sludge and turbid water, and appears to be slow draining. Water discharged from the clarifier and dosing tank should be clear. The source of the turbid water should be investigated and corrections made to upstream treatment processes. The sand beds should then be allowed to dry, all sludge removed, and the source of the slow draining investigated.

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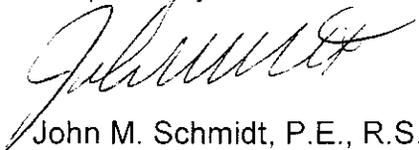
**NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (e-DMRs) received by Ohio EPA for the period May 1, 2011 through July 1, 2011 indicates no apparent noncompliance of the terms and conditions of your NPDES permit.

**Please provide documentation that the headworks, sand filters and surface sand filters have been brought back into proper operation.**

If you have any questions or comments regarding this limited scope inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt, P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

File: Industrial/Detrex Corp./PC