



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 20, 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 June 14, 2011, a 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 Tom Doll, Sam Spain, and Keith Buell representing Detrex Corporation, Chemicals Division (Detrex) during the inspection. The purpose of the 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 May 27, 2010.

Waste water treatment at Detrex is accomplished by four different processes:

1. Industrial Waste Water Treatment (Carbon Treatment System):

Plant industrial wastes include the dense non-aqueous phase liquids (DNAPL) recovery system, treated ZDDP VOC scrubber wastewater, boiler blow down wastewater, and water softener regeneration wastewater. Wastewater is collected in a 1 million gallon storage tank. Once collected, these wastewaters are treated through a multimedia pre-filter containing charcoal, sand, gravel, then two carbon filters in series prior to discharge to a collection manhole. The internal outfall from the activated carbon units is Outfall 602.

2. Ground Water (DNAPL) Recovery System:

Ground water contaminated with dense non-aqueous phase liquids (DNAPL) is collected via a collection sump and pumped to a gravity settling pond, where DNAPL is decanted for off-site disposal. The wastewater in the settling pond is sent through the industrial wastewater treatment system noted in Item 1 above.

3. Storm Water Treatment System

Storm water within the Detrex facility is collected in a series of channels and directed to either the east storm water sump or the west storm water sump and is pumped to the 1 million gallon storage tank. Treatment following collection in the 1 million gallon storage tank is as listed for industrial wastewater treatment noted in Item 1 above.

4. Plant Sanitary Waste Water Treatment:

The system consists of a trash trap, equalization tank with sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank. The internal outfall from the WWTP is outfall 601. Flows from the sanitary WWTP (Outfall 601), the outfall from the carbon treatment WWTP (Outfall 602), and noncontact cooling water from various sources are combined in collection manhole. The combined plant effluent is metered and sampled as Outfall 002, and discharges to Fields Brook west of the plant. No backup power is provided to the facility, and the facility is provided with alarms.

Noncontact Cooling Water:

Noncontact cooling water is untreated and discharged to the collection manhole where Outfall 601 (Sanitary WWTP outfall) and Outfall 602 (Carbon Treatment System outfall) combine.

Observations

The following observations were made during the inspection.

1. The industrial wastewater treatment system (carbon treatment unit) and storm water treatment system were inspected and found to be in satisfactory condition.
2. The plant is operated by Keith Burell, Dave Pildner, and David Easterling, all Detrex personnel. Ohio EPA has no record of notification of the Operator of Record (ORC) for this facility. I provided Detrex with a copy of the ORC notification during my inspection.
3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
4. The content of the aeration tank had a medium brown color and good mixing. Sludge returns were a medium brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition. The surface of the clarifier was clear and effluent channels and weirs were clean. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition. Surface sand filters were clean and operable. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged. The final effluent was clear as observed in a manhole between the plant and the final outfall.

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5. The final discharge to Fields Brook (Outfall 002) was found to be discharging clear at the inspection manhole.
6. The storm water pollution prevention plan (SWPPP) was updated on June 2009. The annual site certification inspection was completed on November 23, 2010, which included an examination of the SWPP document. Employee training is conducted throughout the year, with the latest training conducted on February 24, 2011.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2010 through May 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00530	Total Suspended Solids	30D Conc	5	8.2	12/1/2010

A response provided to Ohio EPA on January 20, 2011 indicates that Detrex believes that the allowable discharge limit of suspended solids from Outfall 002 is 5.0 mg/l above the value reported for Outfall 800. Your NPDES permit, as issued on July 1, 2008 states that the maximum monthly average of suspended solids is 5.0 mg/l with no reference to 5.0 mg/l above the limit reported on Station 800. This is also referenced in your correspondence of November 23, 2009, citing a footnote that appeared in a previous NPDES permit. x

Reporting Violations

No reporting frequency violations were noted for the reporting period reviewed, however the following reporting code violations are noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
800	50050	Flow Rate			AD	8/10/2010
800	50050	Flow Rate			AD	8/11/2010
800	50050	Flow Rate			AD	8/12/2010
800	50050	Flow Rate			AD	8/13/2010
800	50050	Flow Rate			AD	8/14/2010
800	50050	Flow Rate			AD	8/15/2010
800	50050	Flow Rate			AD	8/16/2010
800	50050	Flow Rate			AD	8/17/2010
800	50050	Flow Rate			AD	8/18/2010

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
800	50050	Flow Rate			AD	8/19/2010
800	50050	Flow Rate			AD	8/20/2010
800	50050	Flow Rate			AD	8/21/2010
800	50050	Flow Rate			AD	8/22/2010
800	50050	Flow Rate			AD	8/23/2010
800	50050	Flow Rate			AD	8/24/2010
800	50050	Flow Rate			AD	8/25/2010
800	50050	Flow Rate			AD	8/26/2010
800	50050	Flow Rate			AD	8/27/2010
800	50050	Flow Rate			AD	8/28/2010
800	50050	Flow Rate			AD	8/29/2010
800	50050	Flow Rate			AD	8/30/2010
800	50050	Flow Rate			AD	8/31/2010
800	50050	Flow Rate			AD	9/1/2010
800	50050	Flow Rate			AD	9/2/2010
800	50050	Flow Rate			AD	9/3/2010
800	50050	Flow Rate			AD	9/4/2010
800	50050	Flow Rate			AD	9/5/2010
800	50050	Flow Rate			AD	9/6/2010
800	50050	Flow Rate			AD	9/7/2010
800	50050	Flow Rate			AD	9/8/2010
800	50050	Flow Rate			AD	9/9/2010
800	50050	Flow Rate			AD	9/10/2010
800	50050	Flow Rate			AD	9/11/2010
800	50050	Flow Rate			AD	9/12/2010
800	50050	Flow Rate			AD	9/13/2010
800	50050	Flow Rate			AD	9/14/2010

Ohio EPA could locate no records as to why the code "AD" was reported for flow from August 10, 2010 through September 14, 2010. During the inspection Detrex staff indicated that a power surge caused by lightning disabled the flow meter and it could not be repaired until September 15, 2010.

Other Violations

Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA at the address listed on the form. As a courtesy, please provide a copy of this form in your response to this office.

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Based on the above information, Detrex is considered to be in substantial compliance with the terms and conditions of the NPDES permit.

If you have any questions or comments regarding this 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/mt

encl: Operator of Record Form

File: Industrial/Detrex Corp./PC