

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 8, 2010

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

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

Dear Mr. Steib:

On May 27, 2010, a limited scope site inspection was conducted at the above referenced facility at 1100 North State Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt and Erm Gomes of this office, with you and Tom Doll 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 November 5, 2008.

Waste water treatment at Detrex is accomplished by four different processes (see attached figure):

Industrial Waste Water Treatment (Carbon Treatment System):

Plant industrial wastes and plant storm water flows are collected in a 1 million gallon storage tank. Plant industrial wastes include the dense non-aqueous phase liquids (DNAPL) ground water recovery system, cooling tower blow down, ZDDP VOC scrubber, fine chemicals treatment, water treatment, boiler blow down, and water softener regeneration waste waters. Once collected, waste water is treated through a series of two carbon filters prior to discharge to collection manhole. The internal outfall from the activated carbon units is Outfall 602. 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.

Ground Water (DNAPL) Treatment:

Ground water contaminated with dense non-aqueous phase liquids (DNAPL) is collected via a collection sump and pumped to a gravity settling pond. Following settling, water is discharged to the storm water treatment system and the 1 million gallon storage tank. This system was not inspected during the site visit.

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Plant Sanitary Waste Water Treatment:

The plant receives plant sanitary wastes. The system consists of a trash trap, equalization tanks; extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW or hauling to a landfill. The 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 discharged to the collection manhole where Outfall 601 (Sanitary WWTP outfall) and Outfall 602 (Carbon Treatment System outfall) combine. Flows from the sanitary WWTP (Outfall 601), the outfall from the carbon treatment WWTP (Outfall 602), and noncontact cooling water 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.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 600 gallons per day, and receives between 200 and 800 gpd. The plant was observed in good working order, with good sludge color and aeration.
2. The final discharge to Fields Brook (Outfall 002) was found to be discharging clear at the inspection manhole.

NPDES Permit Compliance Review

Detrex operates under Permit 3IF00017*ND. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2008 through May 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violation was noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00530	Total Suspended Solids	30D Conc	5	6.6	10/1/2009

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A written explanation as to why this exceedance occurred must be provided.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

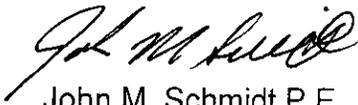
No "other" violations were noted for the reporting period reviewed.

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

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

File: Detrex Corp. (Ashtabula Twp) Ashtabula Co/Industrial P/C

