



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 11, 2009

RE: ECKART AMERICA
PERMIT NO. 3II00071
LAKE COUNTY

Mr. Gilles Legare
Head of Operations
Eckart America Corporation
830 East Erie Street
P.O. Box 747
Painesville, Ohio 44077

Dear Mr. Legare:

On November 12, 2009, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Eric Selbe, Environmental Health & Safety Manager and you. The purpose of the inspection was to evaluate the facility's stormwater management housekeeping operations along with the facility's general compliance with its NPDES permit.

During the inspection the following items were noted/discussed:

1. Eckart employs 110 people.
2. The facility has six stormwater outfalls. All six outfalls were inspected. No visual impacts to the receiving stream were observed.
3. At outfall 3II000711001, it was noted that two unidentified pipes exist. Mr. Selbe indicated that both pipes discharge during a rain event. The source of both of these pipes should be identified.
4. The facility's SPCC plan was last updated January 2007.
5. The facility's permit requires that a Stormwater Pollution Prevention Plan be prepared within six months of the effective date of the facility's NPDES permit. The effective date of the facility's NPDES permit was May 1, 2007. To date, no Stormwater pollution Prevention Plan has been prepared. Eckart should begin preparing this plan immediately. Part IV of the facility's permit details the contents of what that plan shall include.
6. During the last inspection on January 30, 2007 it was noted that an atomizer tote was observed outdoors which contained a metallic looking residue on it. Eckart was advised that these totes should be stored indoors to prevent any metals from being discharged off of the property into Waters of the State. Mr. Selbe informed me that these atomizer totes have been moved indoors.
7. The previous inspection also noted that dumpsters were sitting outside exposed to the elements. All dumpster are now covered.
8. **Effluent concentrations for copper total recoverable, and zinc total recoverable continue to be reported at elevations which exceed water**

- quality based effluent limits.** Eckart America was directed to investigate ways to reduce these concentration levels in my last correspondence dated February 21, 2007. A letter from Eckart dated April 25, 2007 detailed several courses of action. Eckart is encouraged to continue investigating ways to reduce the elevated concentration levels of metals being discharged into Waters of the State.
9. During my last inspection, Mr. Michael Craig, former Eckart employee, informed me that samples taken at outfall 001 were representative of the effluent quality for both outfall 001 and outfall 004. Samples taken at outfall 002 were representative of the effluent quality for outfalls 002, 003, 005, and 006. **Eckart America was directed in my last correspondence dated February 21, 2007 to initiate sampling each individual outfall until such time that the source of the elevated metal concentrations could be located and eliminated. Correspondence from your office dated April 25, 2007 stated that monitoring would be performed at each of the outfalls instead of just the two representative outfalls. Mr. Selbe indicated that all the outfalls were not being sampled individually until June 2009. Eckart is again directed to continue sampling each outfall individually until such time that the source(s) of the elevated metal concentrations can be located and eliminated.**
 10. In reviewing recent discharge monitoring data with Mr. Selbe, it appears that the more elevated concentration levels are at outfalls 3II00071003, 3II00071005, and 3II00071006. Mr. Selbe indicated that all three of these outfalls are associated with Obron operations and utilize dust collection systems.
 11. Mr. Selbe is working on improving a Preventative Maintenance Program for the Obron milling dust collection systems. It was estimated that 25-30 systems exist.
 12. Please note that Part V of the NPDES permit also requires annual sampling based on the monitoring requirements specified in Part V.B. Sampling criteria specified under Part V.B.3 must be met during this sampling. Clarification was provided that this annual sample is not required to be collected in September. The annual sample can be collected anytime though out the year. However, care should be taken that the sampling criteria referenced above is met. This data is not required to be submitted but is required to be kept on site.
 13. The question was asked, "What should the facility do if a stormwater sample cannot be collected during the months of June and October as required by the facility's NPDES permit?" The facility should make every effort possible to obtain a sample during these months, however if no sample can be obtained, the facility should report no flow for that month. It is the intention of the Agency to collect data from the facility's six outfalls twice per year. If samples are unable to be obtained in June and October samples are permitted to be taken in other months. Due to limitations of Ohio EPA's Surface Water Information Management System, SWIMS, when compliance is run, the

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computer is only looking for the data in the months of June and October. This can be accomplished by the facility amending their June and/or October electronic Discharge Monitoring Reports once a sample has been collected and analyzed.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2007 through October 31, 2009 for the referenced facility. As stated in item 3 above, certain metals concentrations are being reported via outfall 3II00071001 and 3II00071002 which exceed water quality based effluent limits.

Limit Violations

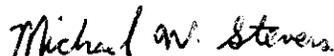
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
005	00400	pH	1D Conc	6.5	1.95	10/23/2007
002	00400	pH	1D Conc	6.5	6.2	6/17/2009
004	00400	pH	1D Conc	6.5	6.2	6/17/2009

No frequency violations were noted.

Please notify this office in writing within 21 days receipt of this letter your intentions for items 3, 5, 8, 9, 11, and 12. This letter should include dates either actual or proposed.

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/mt