



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

December 24, 2007

RE: DEGUSSA INITIATORS, INC.  
PERMIT NO. 3IN00340  
LORAIN COUNTY

Mr. Bill Karlovitz  
Weston Solutions Inc.  
750 E. Bunker Ct.  
Suite 500  
Vernon Hills, IL 60061

Dear Mr. Karlovitz:

On December 19, 2007, an inspection of the above referenced facility's Groundwater treatment system was conducted. The facility was represented by Mr. John W. Wharton, EHSQ Manager from Degussa Initiators, Inc. The purpose of the inspection was to evaluate the performance of the groundwater treatment system along the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted:

1. Weston Solution Inc. continues to be contracted to operate and oversee the groundwater clean up being conducted at 555 Garden Street, Elyria Ohio.
2. Degussa personnel are contracted by Weston Solutions Inc. to perform the manual maintenance on the groundwater treatment system.
3. The system has been discharging on average approximately 20,000 gpd since January 1, 2007, with a maximum discharge of approximately 40,000 gpd.
4. The treatment system was scheduled to be temporarily shut down from December 18, 2007, until December 24, 2007.
5. There was no discharge at the outfall at the time of the inspection since the system was temporarily shut down.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2007, through October 31, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Conc	10	28.	1/1/2007
001	80082	CBOD 5 day	1D Conc	15	28.	1/3/2007
001	80082	CBOD 5 day	30D Conc	10	30.	2/1/2007
001	80082	CBOD 5 day	1D Conc	15	30.	2/7/2007
001	80082	CBOD 5 day	30D Conc	10	20.9	4/1/2007
001	80082	CBOD 5 day	1D Conc	15	20.9	4/11/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	7/11/2007

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### Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
1/31/2007	001	50050	Flow Rate	1/Day	1	0
3/1/2007	001	01074	Nickel, Total Recoverable	1/Quarter	1	0
3/1/2007	001	01094	Zinc, Total Recoverable	1/Quarter	1	0
3/1/2007	001	01114	Lead, Total Recoverable	1/Quarter	1	0
6/1/2007	001	01074	Nickel, Total Recoverable	1/Quarter	1	0
6/1/2007	001	01094	Zinc, Total Recoverable	1/Quarter	1	0
6/1/2007	001	01114	Lead, Total Recoverable	1/Quarter	1	0

Kraft Foods needs to continue to work toward compliance with its NPDES permit.

**Please notify this office in writing within 20 days receipt of this letter what action are proposed to bring Kraft foods back into compliance with its NPDES permit. The letter should include dates either actual or proposed.**

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

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

cc: John W. Wharton, Degussa Initiators, Inc