



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 20, 2008

RE: KRAFT FOODS  
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 September 23, 2008, 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 with 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/discussed:

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 November 1, 2007.
4. The treatment system was temporarily shut down on September 22, 2008. Mr. Jason Drew, a Degussa employee, indicated that the system is typically shut down for half a day during routine maintenance/cleaning. This consists of draining the equalization tank down, sucking out the silt, and changing the bag filter.
5. Mr. Drew indicated the system is cleaned approximately once per week and the bag filter is changed approximately every four days.
6. There was no discharge at outfall 3IN00340001 at the time of the inspection since the system was temporarily shut down.
7. It should be noted that certain metals are required to be submitted "1/Quarter". Page 6 of the facility's NPDES permit defines "1/Quarter" as the months of March, June, August, and December.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2007 through September 30, 2008 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:

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**Limit Violations**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Conc	10	40.	11/1/2007
001	80082	CBOD 5 day	1D Conc	15	40.	11/7/2007
001	80082	CBOD 5 day	30D Conc	10	28.	12/1/2007
001	80082	CBOD 5 day	1D Conc	15	28.	12/12/2007
001	80082	CBOD 5 day	30D Conc	10	31.	4/1/2008
001	80082	CBOD 5 day	1D Conc	15	31.	4/14/2008
001	80082	CBOD 5 day	30D Conc	10	30.	5/1/2008
001	80082	CBOD 5 day	1D Conc	15	30.	5/14/2008
001	80082	CBOD 5 day	30D Conc	10	36.	7/1/2008
001	80082	CBOD 5 day	1D Conc	15	36.	7/9/2008
001	80082	CBOD 5 day	30D Conc	10	12.	8/1/2008

**Frequency Violations**

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
12/1/2007	001	01074	Nickel, Total Recoverable	1/Quarter	1	0
12/1/2007	001	01094	Zinc, Total Recoverable	1/Quarter	1	0
12/1/2007	001	01114	Lead, Total Recoverable	1/Quarter	1	0

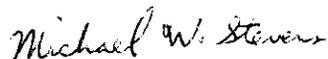
Kraft Foods needs to continue to work toward compliance with its NPDES permit.

**This office is in receipt of your letter dated October 14, 2008. The letter indicates the corrective actions Weston Solutions proposes which are intended to return Kraft Foods back to compliance.**

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: Mr. John W. Wharton, Degussa Initiators, Inc