



**Environmental  
Protection Agency**

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

March 24, 2011

RE: ESAB WELDING & CUTTING PRODUCTS  
OHIO EPA PERMIT 3IC00071  
ASHTABULA TWP., ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. David Johnson, Plant Manager  
The ESAB Group, Inc.  
ESAB Welding and Cutting Products  
3325 Middle Road  
Ashtabula, OH 44004

Dear Mr. Johnson:

On March 22, 2011, a site inspection was conducted at the above referenced facility at 3325 Middle Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt and Virginia Wilson of this office. Mr. Jake Minsinger, Environmental Health and Safety Manager, Mr. Charles Lawson, Environmental Health and Safety Coordinator, and Dale Piccirillo, Treatment Plant Operator, represented The ESAB Group, Inc. / ESAB Welding and Cutting Products (ESAB) 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 September 15, 2009.

Industrial Waste Water treatment

Ohio EPA notes that the system consists of a treatment system for wire drawing and metal finishing, specifically carbon steel and alloy steel welding wires. Wastewater from various production lines and floor drains discharge to a series of sumps throughout the plant. Some sumps are pumped while others are manually collected in plastic totes.

Waste pickle liquor is pumped to 10,000 gallon tank, with a 100,000 gallon equalization tank used for excess volumes. The 10,000 waste pickle liquor tank discharges to a 47,000 gallon wet well (90 pit) for further treatment. Copper-containing wastes are collected portable totes from the sumps and manually discharged to a 2,500 gallon holding/equalization tank, then flows to a wet well (90 pit). Contact cooling water, boiler blow-down lines, and filtrate lines from the sludge pressing operations also discharge to a 47,000 gallon wet well (90 pit).

Wastes collected in the wet well (90 pit) flow to a three stage chemical mixing operation to adjust the pH. Each tank in the process is 7,000 gallons. Each stage can be bypassed as needed for operations and maintenance. Stage 1 tank receives influent from the 90 pit, sludge from the clarifier, and sludge from the sludge holding tank, and is mechanically mixed. Caustic soda and air is added. Stage 2 tank receives influent from Stage 1 tank via gravity and adds caustic soda, air, and sodium dimethyldiocarbamate are mechanically mixed to aid in settling of inorganic compounds (metals), specifically copper and raises the pH to approximately 3.0. Stage 3 tank receives influent from Stage 2 tank via gravity and adds caustic soda until a slurry is created and raises the pH to approximately 5.5. Stage 3

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then flows into one of two rapid-mix flocculator tanks. Polymer is added to these tanks and mechanically mixed. The slurry then flows to the Lamella (plate) clarifiers. Treated effluent flows from the clarifiers to a discharge line to a manhole where flow is monitored and samples collected with an ISCO sampler as Outfall 602. The manhole discharges to a receiving ditch.

Sludge is pumped from the clarifiers to a 10,000 gallon sludge holding tank. Sludge is then pumped through a plate and frame filter press. Filtrate flows by gravity back to the 90 pit at the treatment headworks. Pressed sludge drops into a sealed roll-off dumpster for characterization and off-site disposal. Nonhazardous sludge is taken to a solid waste disposal facility, and materials determined hazardous are taken to a hazardous waste treatment, storage, and disposal facility. Nonhazardous sludge is taken to the Geneva Landfill, a licensed solid waste disposal facility, and materials unable to be disposed of as a solid waste are hauled to a licensed hazardous waste treatment, storage and disposal facility.

#### Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility, as well as storm water runoff from the adjacent ASTHA Chemical plant and Millennium Chemical Plant, located east and south of the ESAB facility respectively. Storm water is collected and discharged to ditches around the perimeter of the facility and is collected in a storm water pond located northwest of the manufacturing building. Materials are all managed under roof except for sealed roll-off boxes. When boxes are emptied, collected storm water within the boxes is collected and drained to the wastewater collection system.

#### Plant Sanitary Waste Water Treatment:

Plant sanitary wastes are conveyed to Elkem Metals sanitary wastewater plant located north of the ESAB facility for treatment and are not a part of this NPDES permit.

#### Observations

The following observations were made during the inspection.

1. The general operation and maintenance of the wastewater treatment system appeared to be satisfactory. It was indicated during the inspection that the treatment system improvements, authorized under Permit-to-Install (PTI) 651287 issued June 2008 were completed in early 2009.
2. The effluent samplers at Station Nos. 3IC00071002 and 3IC00071602 collect composite samples on a time-proportional basis and not a flow-proportional basis.
3. The design flow of the chemical wastewater treatment plant is 98,200 gpd, with a peak flow of 150,000 gpd. The actual flow the plant is currently about 40,000 gpd through the week, with a weekend flow of about 4,000 gpd.

4. A number of repairs were made to the system since the last inspection, including tracing floor drains and other underground piping that had been previously been discharging to the storm water system and redirected these to the wastewater treatment plant. Heaters in the central copper system were replaced in March-April 2010. The copper system was re-plumbed into a closed loop system to eliminate uncontrolled copper discharges into process waters. Several leaks were identified in the copper plating process have been repaired.
5. A copper recycling system was implemented at the time of the last inspection that utilizes two 500 gallon tanks that have a backflow to additional tanks that could overflow into floor drains. Operational procedures have been revised to minimize future overflow events.
6. A log book of repairs and observations is maintained at the WWTP and in Mr. Lawson's office electronically. Dale Piccirillo performs routine operations at the WWTP, monitors the facility, and performs the sampling. William Schuler prepares the electronic discharge monitoring report (eDMR) and you submit of the eDMR through Ohio EPA's Web-based application.
7. pH meters are calibrated weekly.
8. Clarifiers were observed in good working order, with a small amount of scum. Wirs and baffles are cleaned approximately three times per week. The skimmer and return sludge lines were observed in operational condition. Sludge is removed from the system quarterly.
9. The wastewater plant discharge (Station 602) was found to be submerged. The final discharge to the ditch (Station 002) was found to be discharging clear.
10. The storm water pollution prevention plan (SWPPP) was updated on November 30, 2010. The annual site certification inspection was completed on January 15, 2011. Employee training is conducted throughout the year, with the latest training conducted on January 15, 2011.
11. No evidence of discharges was noted from the roll-off box storage area.

#### **NPDES Permit Compliance Review**

ESAB operates under Permit 3IC00071\*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2009 through March 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:

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| Station | Reporting Code | Parameter                 | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|---------------------------|------------|-------|----------------|----------------|
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 47.5           | 1/27/2010      |
| 002     | 50092          | Mercury, Total Low Level  | 30D Conc   | 1.3   | 16.4           | 1/1/2011       |
| 002     | 50092          | Mercury, Total Low Level  | 30D Conc   | 1.3   | 16.4           | 2/1/2011       |
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 107.           | 2/10/2010      |
| 002     | 50092          | Mercury, Total Low Level  | 30D Conc   | 1.3   | 15.8           | 11/1/2010      |
| 002     | 50092          | Mercury, Total Low Level  | 30D Conc   | 1.3   | 18.7           | 12/1/2010      |
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 76.9           | 4/5/2010       |
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 39.7           | 4/15/2010      |
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 76.9           | 3/5/2010       |
| 002     | 01119          | Copper, Total Recoverable | 1D Conc    | 38    | 39.7           | 3/15/2010      |

A written explanation as to why these exceedences occurred, along with measures to ensure that they are not repeated were provided to Ohio EPA via correspondence dated February 18, 2010, March 10, 2010, March 12, 2010, September 8, 2010, December 20, 2010, and February 24, 2011. Copper violations were resolved due to process changes instituted in March-April 2010, and Ohio EPA notes that ESAB has a mercury variance request pending with Ohio EPA. No additional response is required at this time to address these exceedences.

#### Reporting Violations

The following reporting code violations were noted for the reporting period reviewed:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 002     | 50050          | Flow Rate |            |       | AD             | 7/1/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/2/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/3/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/4/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/5/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/6/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/7/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/8/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/9/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/19/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/20/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/21/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/22/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/23/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/24/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/25/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/26/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/27/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/28/2010      |

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| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 002     | 50050          | Flow Rate |            |       | AD             | 7/29/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/30/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 7/31/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/1/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/2/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/3/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/4/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/5/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/6/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/7/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/8/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/9/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/10/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/11/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/12/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/13/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/14/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/15/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/16/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/17/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/18/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/19/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/20/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/21/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/22/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/23/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/24/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/25/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/26/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/27/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/30/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 8/31/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/1/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/2/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/3/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/4/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/5/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/6/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/7/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/8/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/9/2010       |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/10/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/11/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/12/2010      |

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| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 002     | 50050          | Flow Rate |            |       | AD             | 9/13/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/14/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/15/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/16/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/17/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/18/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/19/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/20/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/21/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/22/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/23/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/24/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/25/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/26/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/27/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/28/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/29/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 9/30/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/1/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/2/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/3/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/4/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/5/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/6/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/7/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/8/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/11/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/12/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/13/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/14/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/15/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/16/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/17/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/18/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/19/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/20/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/21/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/21/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/22/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/22/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/23/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/23/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/24/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/24/2010     |

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| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 002     | 50050          | Flow Rate |            |       | AD             | 10/25/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/25/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/26/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/26/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/27/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/27/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/28/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/28/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/29/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/29/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/30/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/30/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 10/31/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 10/31/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/1/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/1/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/2/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/2/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/3/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/3/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/4/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/4/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/5/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/5/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/6/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/6/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/7/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/7/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/8/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/8/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/9/2010      |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/9/2010      |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/10/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/10/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/11/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/11/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/12/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/12/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/13/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/13/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/14/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/14/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/15/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/15/2010     |

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| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 002     | 50050          | Flow Rate |            |       | AD             | 11/16/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/16/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/17/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/17/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/18/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/18/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/19/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/19/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/20/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/20/2010     |
| 002     | 50050          | Flow Rate |            |       | AD             | 11/21/2010     |
| 602     | 50050          | Flow Rate |            |       | AD             | 11/21/2010     |

A written explanation as to why these exceedences occurred, along with measures to ensure that they are not repeated were provided to Ohio EPA via correspondence dated September 8, 2010, September 30, 2010, and December 20, 2010. Ohio EPA notes that the problem with not obtaining an accurate flow reading continues. You stated that you installed a beaver deterrent structure and jetted the piping that Outfall 002 discharges to, and removed excess vegetation and wood. You indicated that as soon as weather permits you plan on "jetting" the outfall pipe that flows north to the Elkem property and removing additional wood and vegetation. Additional beaver deterrents would need approval through the Ohio Department of Natural Resources (ODNR). Please provide Ohio EPA with a status report to ensure proper operation of the flow meter or installation of a new flow meter, including a schedule to remove downstream blockage on the adjacent Elkem property to the north.

Compliance Schedule Violations

The following compliance schedule obligations were noted for the reporting period reviewed:

| App No   | Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone    |
|----------|-----------------------|------------------------|-------------------|-----------------|------------|---------------|-----------------------|
| 3IC00071 | 07/01/08              | 07/31/12               | 01/01/2009        | 10/30/08        | 03099      | Construction  | Initiate Construction |
| 3IC00071 | 07/01/08              | 07/31/12               | 01/01/2009        | 01/15/09        | 04599      | Construction  | Complete Construction |
| 3IC00071 | 07/01/08              | 07/31/12               | 03/01/2009        | 05/01/10        | 05599      | Construction  | Attain Compliance     |
| 3IC00071 | 07/01/08              | 07/31/12               | 07/01/09          | 06/30/10        | 20099      | Variance      | Submit Hg Variance    |

ESAB did not get the construction completed on PTI 651287 prior to January 1, 2010, and did not achieve compliance by March 1, 2009, both violations of its NPDES permit. No additional response is required to respond to these violations.

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Other Violations

Composite Sample Collection – Part II, Item H of your NPDES permit requires that composite samples be collected over a 24-hour period and proportionate in volume to the waste water flow rate at the time of sampling. Your sampler must be able to collect samples proportionate to the flow of the final effluent. Most composite samplers have provisions of collecting either time-weighted samples or flow proportionate samples, and flow proportionate sampling requires a signal from the flow meter. Please provide documentation that necessary improvements have been made to the existing samplers and flow meters to ensure that samples are collected on a flow-proportionate basis.

Based on the above information, the ESAB Group, Inc. / ESAB Welding and Cutting Products is considered to be in substantial compliance with the terms and conditions of the NPDES permit for its Ashtabula facility. 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: Industrial – ESAB Group, Inc./pc

