



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

October 19, 2008⁹

RE: ASHTABULA COUNTY
THE ESAB GROUP, INC.
OHIO EPA PERMIT NO. 3IC00071
NPDES PERMIT NO. OH0063789

Mr. David Johnson, Plant Manager
The ESAB Group, Inc.
3325 Middle Road
Ashtabula, Ohio 44005

Dear Mr. Johnson:

On September 15, 2009, a Compliance Evaluation Inspection was conducted at the above referenced facility by the undersigned. The facility was represented by Messrs. Chuck Lawson, EHS Coordinator, and Dale Piccirillo, Treatment Plant Operator. The purpose of the inspection was to evaluate 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 course of the inspection, evaluations were conducted of the facility's treatment processes and equipment and effluent discharge quality.

At the time of the inspection, the following observations and comments were noted:

1. The general operation and maintenance of the wastewater treatment system appeared to be satisfactory. It was indicated that the treatment system improvements, authorized under the Permit to install, were completed in late 2008 to early 2009.
2. The effluents being discharged at Station 602 and Outfall 002 were visually clear, with no evidence of floating debris or excessive oil & grease.
3. It was noted that facility is continuing to experience operational difficulties with the flowmeter at the existing Outfall 002 location. It was recommended that the facility evaluate the feasibility of relocating the meter onto its property, e.g. at the culvert inlet.
4. The current Storm Water Pollution Prevention Plan (SWPPP) needs to be updated to reflect operational and personnel changes at the site. Examples of needed changes include the following:
 - Ensure page numbers are consistent and correct.

Mr. David Johnson
The ESAB Group, Inc.
October 19, 2009
Page 2

- Identify the name and contact information for individuals on the Pollution Prevention.
- Ensure that sample copies of inspection forms are in the plans.

A review of the self-monitoring reports received by Ohio EPA for the period, October 2008 - September 2009, indicated the following:

1. The facility appears to have satisfactorily achieved compliance with the copper effluent limitations in the NPDES permit. However, notification letter required by the NPDES permit was not submitted to this office.
2. The current Mercury data suggests that the facility will not achieve compliance with the final 30-day effluent limitation. Pursuant to the "Schedule of Compliance", the facility was required to submit applicable documentation regarding its compliance status to Ohio EPA by July 1, 2009. No such documentation has been received to date.

Please be advised that failure to satisfy the terms and conditions of the NPDES permit may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111. Such actions can result in fines of up to \$10,000 per day per violation. It is requested that the facility submit a formal response detailing the actions that will be taken to address the deficiencies and/or violations referenced herein. Your response shall include dates for initiation and completion of the action items.

If there are any questions or comments regarding this notification, please contact this office.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

File: Industrial/ESAB/PC