



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 27, 2007

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

Mr. George Gilbert, Plant Manager
The ESAB Group, Inc.
3325 Middle Road
Ashtabula, OH 44005

Dear Mr. Gilbert:

On June 12, 2007, a pre-permit inspection was conducted at the above-referenced facility by Mr. Chris Coder and the undersigned. The purpose of the inspection was to (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal. During the course of the inspection, evaluations were conducted of the facility's treatment processes and equipment and effluent discharge quality at the respective outfalls.

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

1. A new filter press had been installed.
2. A new mixer had been installed on the flocculation tank.
3. The pipeline over to the Elkem property was been cleaned out to reestablish flow in the line.
4. A gate had been installed at the outlet of the discharge pond. This gate was installed to prevent flow from the pond in response to a recent spill that happened at the facility.
5. The truck pad adjacent to the outside treatment storage tank was redesigned to have flow redirected back into the tank.
6. The system appeared to operating properly and the discharge appeared to be clear.

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Ohio EPA is aware that issues arose with the operator hired to monitor the operational condition of the facility and do the required sampling. As a result, ESAB has chosen to take on the responsibilities of monitoring the facility and has hired Stone Environmental to assist in obtaining the renewal of the NPDES permit. With this in mind, a review of the self-monitoring reports received by Ohio EPA for the period January 1, 2007, through June 1, 2007, are the only reports being noted in this correspondence.

The reports indicate that the facility has had numerous violations since the beginning of the year, specifically with respect to coding. These violations indicate that the facility is currently in substantial noncompliance with the NPDES permit. The violations are as follows:

Limit Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	002	Copper, Total Recovera	1D Conc	38	1130.	1/19/2007
February 2007	002	Copper, Total Recovera	1D Conc	38	2600.	2/7/2007
March 2007	002	Copper, Total Recovera	1D Conc	38	1010.	3/14/2007
April 2007	002	Copper, Total Recovera	1D Conc	38	412.	4/23/2007
May 2007	002	Copper, Total Recovera	1D Conc	38	357.	5/2/2007
February 2007	602	Copper, Total (Cu)	30D Conc	421	877.	2/1/2007
February 2007	602	Copper, Total (Cu)	30D Qty	0.328	.73692	2/1/2007
February 2007	602	Total Suspended Solids	30D Conc	18	41.	2/1/2007
February 2007	602	Total Suspended Solids	30D Qty	13.69	41.1751	2/1/2007
February 2007	602	Copper, Total (Cu)	1D Conc	683	877.	2/7/2007
February 2007	602	Copper, Total (Cu)	1D Qty	0.532	.73692	2/7/2007
February 2007	602	Total Suspended Solids	1D Conc	38	120.	2/15/2007
February 2007	602	Total Suspended Solids	1D Qty	29.97	114.912	2/15/2007
March 2007	602	Copper, Total (Cu)	30D Conc	421	591.	3/1/2007
April 2007	602	Copper, Total (Cu)	30D Conc	421	564.	4/1/2007
April 2007	602	Total Suspended Solids	30D Conc	18	31.	4/1/2007
April 2007	602	Total Suspended Solids	1D Conc	38	76.	4/11/2007

Code Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	002	Flow Rate			AD	1/1/2007
January 2007	002	Flow Rate			AD	1/2/2007
January 2007	002	Flow Rate			AD	1/3/2007
January 2007	002	Flow Rate			AD	1/4/2007
January 2007	002	Flow Rate			AD	1/5/2007
January 2007	002	Flow Rate			AD	1/6/2007
January 2007	002	Flow Rate			AD	1/7/2007

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January 2007	002	Flow Rate	AD	1/8/2007
January 2007	002	Flow Rate	AD	1/9/2007
January 2007	002	Flow Rate	AD	1/10/2007
January 2007	002	Flow Rate	AD	1/11/2007
January 2007	002	Flow Rate	AD	1/12/2007
January 2007	002	Flow Rate	AD	1/13/2007
January 2007	002	Flow Rate	AD	1/14/2007
January 2007	002	Flow Rate	AD	1/15/2007
January 2007	002	Flow Rate	AD	1/16/2007
January 2007	002	Flow Rate	AD	1/17/2007
January 2007	002	Flow Rate	AD	1/18/2007
January 2007	002	Flow Rate	AD	1/19/2007
January 2007	002	Flow Rate	AD	1/20/2007
January 2007	002	Flow Rate	AD	1/21/2007
January 2007	002	Flow Rate	AD	1/22/2007
January 2007	002	Flow Rate	AD	1/23/2007
January 2007	002	Flow Rate	AD	1/24/2007
January 2007	002	Flow Rate	AD	1/25/2007
January 2007	002	Flow Rate	AD	1/26/2007
January 2007	002	Flow Rate	AD	1/27/2007
January 2007	002	Flow Rate	AD	1/28/2007
January 2007	002	Flow Rate	AD	1/29/2007
January 2007	002	Flow Rate	AD	1/30/2007
January 2007	002	Flow Rate	AD	1/31/2007
February 2007	002	Flow Rate	AD	2/7/2007
February 2007	002	Flow Rate	AD	2/15/2007
February 2007	002	Flow Rate	AD	2/21/2007
February 2007	002	Flow Rate	AD	2/28/2007
March 2007	002	Flow Rate	AD	3/12/2007
March 2007	002	Flow Rate	AD	3/13/2007
March 2007	002	Flow Rate	AD	3/14/2007
March 2007	002	Flow Rate	AD	3/27/2007
March 2007	002	Flow Rate	AD	3/28/2007
March 2007	002	Flow Rate	AD	3/29/2007
March 2007	002	Flow Rate	AD	3/30/2007
March 2007	002	Flow Rate	AD	3/31/2007
April 2007	002	Flow Rate	AD	4/1/2007
April 2007	002	Flow Rate	AD	4/2/2007
April 2007	002	Flow Rate	AD	4/3/2007
April 2007	002	Flow Rate	AD	4/4/2007
April 2007	002	Flow Rate	AD	4/5/2007
April 2007	002	Flow Rate	AD	4/6/2007
April 2007	002	Flow Rate	AD	4/7/2007
April 2007	002	Flow Rate	AD	4/8/2007
April 2007	002	Flow Rate	AD	4/9/2007
April 2007	002	Flow Rate	AD	4/10/2007
April 2007	002	Flow Rate	AD	4/11/2007

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April 2007	002	Flow Rate	AD	4/12/2007
April 2007	002	Flow Rate	AD	4/13/2007
April 2007	002	Flow Rate	AD	4/14/2007
April 2007	002	Flow Rate	AD	4/15/2007
April 2007	002	Flow Rate	AD	4/16/2007
April 2007	002	Flow Rate	AD	4/17/2007
April 2007	002	Flow Rate	AD	4/18/2007
April 2007	002	Flow Rate	AD	4/19/2007
April 2007	002	Flow Rate	AD	4/20/2007
April 2007	002	Flow Rate	AD	4/21/2007
April 2007	002	Flow Rate	AD	4/22/2007
April 2007	002	Flow Rate	AD	4/23/2007
April 2007	002	Flow Rate	AD	4/24/2007
April 2007	002	Flow Rate	AD	4/25/2007
April 2007	002	Flow Rate	AD	4/26/2007
April 2007	002	Flow Rate	AD	4/27/2007
April 2007	002	Flow Rate	AD	4/28/2007
April 2007	002	Flow Rate	AD	4/29/2007
April 2007	002	Flow Rate	AD	4/30/2007
May 2007	002	Flow Rate	AD	5/2/2007
May 2007	002	Flow Rate	AD	5/3/2007
May 2007	002	Flow Rate	AD	5/4/2007
May 2007	002	Flow Rate	AD	5/5/2007
May 2007	002	Flow Rate	AD	5/6/2007
May 2007	002	Flow Rate	AD	5/7/2007
May 2007	002	Flow Rate	AD	5/8/2007
May 2007	002	Flow Rate	AD	5/9/2007
May 2007	002	Flow Rate	AD	5/10/2007
May 2007	002	Flow Rate	AD	5/11/2007
May 2007	002	Flow Rate	AD	5/12/2007
May 2007	002	Flow Rate	AD	5/13/2007
May 2007	002	Flow Rate	AD	5/14/2007
May 2007	002	Flow Rate	AD	5/15/2007
May 2007	002	Flow Rate	AD	5/16/2007
May 2007	002	Flow Rate	AD	5/17/2007
May 2007	002	Flow Rate	AD	5/18/2007
May 2007	002	Flow Rate	AD	5/19/2007
May 2007	002	Flow Rate	AD	5/20/2007
May 2007	002	Flow Rate	AD	5/21/2007
May 2007	002	Flow Rate	AD	5/22/2007
May 2007	002	Flow Rate	AD	5/23/2007
May 2007	002	Flow Rate	AD	5/24/2007
May 2007	002	Flow Rate	AD	5/25/2007
May 2007	002	Flow Rate	AD	5/26/2007
May 2007	002	Flow Rate	AD	5/27/2007
May 2007	002	Flow Rate	AD	5/28/2007
May 2007	002	Flow Rate	AD	5/29/2007

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May 2007	002	Flow Rate	AD	5/30/2007
May 2007	002	Flow Rate	AD	5/31/2007
January 2007	002	Oil and Grease, Total	AF	1/11/2007
January 2007	002	pH	AD	1/11/2007
January 2007	002	pH	AD	1/19/2007
January 2007	002	pH	AD	1/24/2007
January 2007	002	pH	AD	1/31/2007
March 2007	002	pH	AD	3/9/2007
March 2007	002	pH	AD	3/14/2007
March 2007	002	pH	AD	3/21/2007
March 2007	002	pH	AD	3/29/2007
January 2007	002	Total Suspended Solids	AF	1/11/2007
January 2007	002	Water Temperature	AD	1/11/2007
January 2007	002	Water Temperature	AD	1/19/2007
January 2007	002	Water Temperature	AD	1/24/2007
January 2007	002	Water Temperature	AD	1/31/2007
March 2007	602	Flow Rate	AD	3/12/2007
March 2007	602	Flow Rate	AD	3/13/2007
March 2007	602	Flow Rate	AD	3/14/2007
March 2007	602	Flow Rate	AD	3/27/2007
March 2007	602	Flow Rate	AD	3/28/2007
March 2007	602	Flow Rate	AD	3/29/2007
March 2007	602	Flow Rate	AD	3/30/2007
March 2007	602	Flow Rate	AD	3/31/2007
April 2007	602	Flow Rate	AD	4/1/2007
April 2007	602	Flow Rate	AD	4/2/2007
April 2007	602	Flow Rate	AD	4/3/2007
April 2007	602	Flow Rate	AD	4/4/2007
April 2007	602	Flow Rate	AD	4/5/2007
April 2007	602	Flow Rate	AD	4/6/2007
April 2007	602	Flow Rate	AD	4/7/2007
April 2007	602	Flow Rate	AD	4/8/2007
April 2007	602	Flow Rate	AD	4/9/2007
April 2007	602	Flow Rate	AD	4/10/2007
April 2007	602	Flow Rate	AD	4/11/2007
April 2007	602	Flow Rate	AD	4/12/2007
April 2007	602	Flow Rate	AD	4/13/2007
April 2007	602	Flow Rate	AD	4/14/2007
April 2007	602	Flow Rate	AD	4/15/2007
April 2007	602	Flow Rate	AD	4/16/2007
April 2007	602	Flow Rate	AD	4/17/2007
April 2007	602	Flow Rate	AD	4/18/2007
April 2007	602	Flow Rate	AD	4/19/2007
April 2007	602	Flow Rate	AD	4/20/2007
April 2007	602	Flow Rate	AD	4/21/2007
April 2007	602	Flow Rate	AD	4/22/2007
April 2007	602	Flow Rate	AD	4/23/2007

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April 2007	602	Flow Rate	AD	4/24/2007
April 2007	602	Flow Rate	AD	4/25/2007
April 2007	602	Flow Rate	AD	4/26/2007
April 2007	602	Flow Rate	AD	4/27/2007
April 2007	602	Flow Rate	AD	4/28/2007
April 2007	602	Flow Rate	AD	4/29/2007
April 2007	602	Flow Rate	AD	4/30/2007
May 2007	602	Flow Rate	AD	5/1/2007
May 2007	602	Flow Rate	AD	5/2/2007
May 2007	602	Flow Rate	AD	5/3/2007
May 2007	602	Flow Rate	AD	5/4/2007
May 2007	602	Flow Rate	AD	5/5/2007
May 2007	602	Flow Rate	AD	5/6/2007
May 2007	602	Flow Rate	AD	5/7/2007
May 2007	602	Flow Rate	AD	5/8/2007
May 2007	602	Flow Rate	AD	5/9/2007
May 2007	602	Flow Rate	AD	5/10/2007
May 2007	602	Flow Rate	AD	5/11/2007
May 2007	602	Flow Rate	AD	5/12/2007
May 2007	602	Flow Rate	AD	5/13/2007
May 2007	602	Flow Rate	AD	5/14/2007
May 2007	602	Flow Rate	AD	5/15/2007
May 2007	602	Flow Rate	AD	5/16/2007
May 2007	602	Flow Rate	AD	5/17/2007
May 2007	602	Flow Rate	AD	5/18/2007
May 2007	602	Flow Rate	AD	5/19/2007
May 2007	602	Flow Rate	AD	5/20/2007
May 2007	602	Flow Rate	AD	5/21/2007
May 2007	602	Flow Rate	AD	5/22/2007
May 2007	602	Flow Rate	AD	5/23/2007
May 2007	602	Flow Rate	AD	5/24/2007
May 2007	602	Flow Rate	AD	5/25/2007
May 2007	602	Flow Rate	AD	5/26/2007
May 2007	602	Flow Rate	AD	5/27/2007
May 2007	602	Flow Rate	AD	5/28/2007
May 2007	602	Flow Rate	AD	5/29/2007
May 2007	602	Flow Rate	AD	5/30/2007
May 2007	602	Flow Rate	AD	5/31/2007
January 2007	602	Oil and Grease, Total	AF	1/11/2007
March 2007	602	pH, Maximum	AD	3/5/2007
March 2007	602	pH, Maximum	AD	3/6/2007
March 2007	602	pH, Maximum	AD	3/7/2007
March 2007	602	pH, Maximum	AD	3/8/2007
March 2007	602	pH, Maximum	AD	3/9/2007
March 2007	602	pH, Maximum	AD	3/10/2007
March 2007	602	pH, Maximum	AD	3/11/2007
March 2007	602	pH, Maximum	AD	3/12/2007

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March 2007	602	pH, Maximum	AD	3/13/2007
March 2007	602	pH, Maximum	AD	3/14/2007
March 2007	602	pH, Maximum	AD	3/15/2007
March 2007	602	pH, Minimum	AD	3/5/2007
March 2007	602	pH, Minimum	AD	3/6/2007
March 2007	602	pH, Minimum	AD	3/7/2007
March 2007	602	pH, Minimum	AD	3/8/2007
March 2007	602	pH, Minimum	AD	3/9/2007
March 2007	602	pH, Minimum	AD	3/10/2007
March 2007	602	pH, Minimum	AD	3/11/2007
March 2007	602	pH, Minimum	AD	3/12/2007
March 2007	602	pH, Minimum	AD	3/13/2007
March 2007	602	pH, Minimum	AD	3/14/2007
March 2007	602	pH, Minimum	AD	3/15/2007
January 2007	602	Total Suspended Solids	AF	1/11/2007

Frequency Violations

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
January 2007	1/1/2007	002	Oil and Grease, Total	1/Week	1	0
January 2007	1/1/2007	002	pH	1/Week	1	0
January 2007	1/1/2007	002	Total Suspended Solids	1/Week	1	0
January 2007	1/1/2007	002	Water Temperature	1/Week	1	0
February 2007	2/1/2007	002	Flow Rate	1/Day	1	0
February 2007	2/2/2007	002	Flow Rate	1/Day	1	0
February 2007	2/3/2007	002	Flow Rate	1/Day	1	0
February 2007	2/4/2007	002	Flow Rate	1/Day	1	0
February 2007	2/5/2007	002	Flow Rate	1/Day	1	0
February 2007	2/6/2007	002	Flow Rate	1/Day	1	0
February 2007	2/8/2007	002	Flow Rate	1/Day	1	0
February 2007	2/8/2007	002	Oil and Grease, Total	1/Week	1	0
February 2007	2/8/2007	002	pH	1/Week	1	0
February 2007	2/8/2007	002	Total Suspended Solids	1/Week	1	0
February 2007	2/8/2007	002	Water Temperature	1/Week	1	0
February 2007	2/9/2007	002	Flow Rate	1/Day	1	0
February 2007	2/10/2007	002	Flow Rate	1/Day	1	0
February 2007	2/11/2007	002	Flow Rate	1/Day	1	0
February 2007	2/12/2007	002	Flow Rate	1/Day	1	0
February 2007	2/13/2007	002	Flow Rate	1/Day	1	0
February 2007	2/14/2007	002	Flow Rate	1/Day	1	0
February 2007	2/16/2007	002	Flow Rate	1/Day	1	0
February 2007	2/17/2007	002	Flow Rate	1/Day	1	0
February 2007	2/18/2007	002	Flow Rate	1/Day	1	0
February 2007	2/19/2007	002	Flow Rate	1/Day	1	0
February 2007	2/20/2007	002	Flow Rate	1/Day	1	0

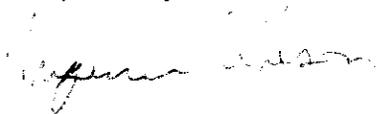
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February 2007	2/22/2007	002	Flow Rate	1/Day	1	0
February 2007	2/23/2007	002	Flow Rate	1/Day	1	0
February 2007	2/24/2007	002	Flow Rate	1/Day	1	0
February 2007	2/25/2007	002	Flow Rate	1/Day	1	0
February 2007	2/26/2007	002	Flow Rate	1/Day	1	0
February 2007	2/27/2007	002	Flow Rate	1/Day	1	0
March 2007	3/1/2007	002	Oil and Grease, Total	1/Week	1	0
March 2007	3/1/2007	002	pH	1/Week	1	0
March 2007	3/1/2007	002	Total Suspended Solids	1/Week	1	0
March 2007	3/1/2007	002	Water Temperature	1/Week	1	0
March 2007	3/22/2007	002	Oil and Grease, Total	1/Week	1	0
March 2007	3/22/2007	002	pH	1/Week	1	0
March 2007	3/22/2007	002	Total Suspended Solids	1/Week	1	0
March 2007	3/22/2007	002	Water Temperature	1/Week	1	0
May 2007	5/1/2007	002	Flow Rate	1/Day	1	0
January 2007	1/1/2007	602	Oil and Grease, Total	1/Week	1	0
January 2007	1/1/2007	602	Total Suspended Solids	1/Week	1	0
January 2007	1/22/2007	602	Oil and Grease, Total	1/Week	1	0
January 2007	1/22/2007	602	Total Suspended Solids	1/Week	1	0
February 2007	2/8/2007	602	Oil and Grease, Total	1/Week	1	0
February 2007	2/8/2007	602	Total Suspended Solids	1/Week	1	0
March 2007	3/1/2007	602	Oil and Grease, Total	1/Week	1	0
March 2007	3/1/2007	602	Total Suspended Solids	1/Week	1	0

Ohio EPA is aware that ESAB is working on addressing the issue with the limit violations with the changes being made to the treatment system. However, these changes do not address the issues with the code violations and frequency violations. Within 14 days of the date of this letter, ESAB should explain why the code and frequency violations are occurring and what efforts will be made to eliminate them.

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

Respectfully,



Virginia Wilson, P.E.
 Geological Engineer
 Division of Surface Water

VW/mt

File: Industrial/ESAB/PC