OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

Semi
Geauga
Burton
Excel

September 13, 2007

RE: GEAUGA COUNTY
EXCEL POLYMERS, LLC
NPDES PERMIT RENEWAL & COMPLIANCE
PERMIT #3IR00038*ED

Mr. John Gorrell, Plant Manager
Excel Polymers, LLC
14330 Kinsman Road
Burton, OH 44021

Dear Mr. Gorrell:

On August 17, 2007, I conducted an inspection of the referenced wastewater treatment and disposal system. The purpose of the inspection is to determine compliance with the National Pollutant Discharge Elimination System (NPDES) Permit issued to you under the Federal Clean Water Act, and to prepare to renew that permit. This report discusses the condition of the wastewater treatment system, current NPDES permit discharge violations, and general control of water pollution associated with your industrial activities.

As a part of the inspection and permit renewal, I walked through the production plant with Jeff Moore of your firm. I observed that Polyone Corporation in Burton is a custom rubber compounding facility, using rubber and carbon black to produce uncured rubber in slabs and strips.

The wastewater treatment plant showed signs of careful attention to operation and maintenance and good housekeeping. For the 18-month period January 1, 2006, to June 1, 2007, Excel accumulated several less significant permit violations (see attached tables). All parts of the wastewater plant were in operation, and the effluent appeared to be well treated and in general compliance with permit limitations.

Other than outfalls numbered 3IR00038003 and 004, all permitted outfalls at Excel discharge through a siphon dam which provides a contingency facility where spills can be controlled prior to discharge to the creek.

Outfall 003 conveys roof drainage and parking area drainage to the ditch along Kinsman Road. This outfall is regulated in Parts IV, V, and VI of the NPDES permit requiring periodic sampling of storm water. It is addressed in your storm water pollution prevention plan.

Outfall 004 conveys roof drainage and parking area drainage to the creek below the siphon dam. This outfall is regulated in Parts IV, V, and VI of the NPDES permit requiring periodic sampling of storm water. It is addressed in your storm water pollution prevention plan.

Internal outfalls 601, 602, 603, 604, and 605 discharge to the siphon dam, and outfall 001 discharges from the dam to the creek.

Outfall 601 comprises the effluent from the 14,000-gallon-per-day sanitary wastewater treatment plant before it is pumped to the fire pond. This outfall is regulated in Part I,A of the NPDES

permit by a table of conventional pollutants with permitted concentrations based on the design flow of 14,000 gallons per day (gpd). Exceeding any permit limitation is subject to enforcement under Ohio Revised Code 6111 and the Federal Clean Water Act with fines up to $10000 per day.

Outfall 602 is treated water from the spill-control diked area around the oil storage tanks at the northeast side of the production plant prior to entering the siphon dam.

Outfall 603 is the discharge from the fire pond, including the sanitary effluent, to the siphon dam.

Outfall 604 conveys roof drainage and parking area drainage to the siphon dam.

Outfall 605 conveys noncontact cooling system overflow, roof drainage, and parking area drainage to the siphon dam.

Outfall 001 is the siphoned overflow from the siphon dam. It combines outfalls 601, 602, 603, 604, and 605. This outfall is regulated in Part I,A of the NPDES permit by a table of conventional pollutants with permitted concentrations. Exceeding any permit limitation is subject to enforcement under Ohio Revised Code 6111 and the Federal Clean Water Act with fines up to $10,000 per day.

Please contact me directly at (330) 963-1260 to discuss any comments or questions you may have regarding this inspection.

Sincerely,

Douglas Hiestand
Environmental Engineer
Division of Surface Water

DH/mt

enc: Tables of Violations, 1/1/2006 to 6/1/2007

cc: Jeff Moore, Excel Polymers

ec: Rich Blasick, Ohio EPA, DSW, NEDO

File: Semi/Geauga/Burton/Excel

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Excel Polyone Limit Violations, 1/1/06 - 6/1/07

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	30D Conc	2	14.2333	12/1/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	7D Conc	3	14.8	12/1/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	7D Conc	3	21.8	12/15/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	7D Conc	3	6.1	12/22/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.26009	12/1/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	7D Qty	0.16	.35291	12/1/2006
3IR00038*DD	December 2006	601	00610	Nitrogen, Ammonia (NH3	7D Qty	0.16	.34655	12/15/2006
3IR00038*DD	March 2006	001	00400	pH	1D Conc	9.0	9.98	3/16/2006
3IR00038*DD	September 2006	601	00530	Total Suspended Solids	30D Conc	12	12.6666	9/1/2006
3IR00038*DD	September 2006	601	00530	Total Suspended Solids	7D Conc	18	33.	9/8/2006

Get New Data

Excel Polyone Failures to Report, 3/1/06 - 3/1/07

	Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
3IR00038*C	2/15/2006	001	50050	Flow Rate	1/2Weeks	1	0
3IR00038*C	2/15/2006	001	00400	pH	1/2Weeks	1	0
3IR00038*C	2/15/2006	601	00300	Dissolved Oxygen	1/Week	1	0
3IR00038*C	3/1/2006	601	00300	Dissolved Oxygen	1/Week	1	0
3IR00038*C	4/15/2006	001	50050	Flow Rate	1/2Weeks	1	0
3IR00038*C	4/15/2006	001	00400	pH	1/2Weeks	1	0
3IR00038*C	7/15/2006	001	50050	Flow Rate	1/2Weeks	1	0
3IR00038*C	7/15/2006	001	00400	pH	1/2Weeks	1	0
3IR00038*C	8/1/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/2/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/3/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/4/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/5/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/6/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/7/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/8/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/9/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/10/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/11/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/12/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/13/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/14/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/15/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/16/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/17/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/18/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/19/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/20/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/21/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/22/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/23/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/24/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*C	8/25/2006	601	01330	Odor, Severity	1/Day	1	0

3IR00038*E	8/26/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/27/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/28/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/29/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/30/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/31/2006	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	8/8/2006	601	00300	Dissolved Oxygen	1/Week	1	0
3IR00038*E	8/22/2006	601	00300	Dissolved Oxygen	1/Week	1	0
3IR00038*E	1/1/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/2/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/3/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/4/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/5/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/6/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/7/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/8/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/9/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/10/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/11/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/12/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/13/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/14/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/15/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/16/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/17/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/18/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/19/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/20/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/21/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/22/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/23/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/24/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/25/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/26/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/27/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/28/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*E	1/29/2007	601	01330	Odor, Severity	1/Day	1	0

3IR00038*D	1/30/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*D	1/31/2007	601	01330	Odor, Severity	1/Day	1	0
3IR00038*D	3/15/2007	601	00400	pH	1/2Weeks	1	0
3IR00038*D	5/15/2007	601	00300	Dissolved Oxygen	1/Week	1	0