

**Environmental  
Protection Agency**

Michael DeWine, Governor  
Richard Cordusio, Lt. Governor  
Chris Grady, Director

November 18, 2010

RE: GABRIEL PERFORMANCE PLASTICS  
ASHTABULA STATE ROAD FACILITY  
NPDES PERMIT NO. 31F00002\*JD  
ASHTABULA TWP, ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. Tyce Workman, Environmental Manager  
Gabriel Performance Products, LLC  
725 State Road  
Ashtabula, Ohio 44004

Dear Mr. Workman:

On November 16, 2010, a site inspection was conducted at the above referenced facility at 725 State Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of Ohio EPA's Division of Surface Water (DSW). You represented Gabriel Performance Products, LLC (Gabriel), and Jim Steudler represented THG Associates, your consultant. 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 October 21, 2008.

The plant primarily produces plastic resins and similar materials on a small batch-basis through a combination of blending, reacting, heating, distilling, drying, filtering, and packaging. Photographs were not permitted within the facility, so photographic documentation is limited to outside the facility perimeter fence. The waste water system consists of the following industrial processes and discharges (see attached figure):

Industrial Waste Water Treatment

Process waste water is generated from Millennium's plant sanitary waste package plant, boiler blow down and gas scrubbers, floor drains in process areas, cooling towers, salt scrubbers, and general plant housekeeping. Waste streams from the cooling towers, salt scrubber, and general plant housekeeping receive pH adjustment in the west pit by the addition of HCl and caustic prior to discharge to the north rain sump. All remaining plant waste except collected storm water and ground water are also collected by the North rain sump and are discharged into the North and South ponds for flow equalization and settling. Waste from the flow equalization ponds receive pH adjustment through HCl and caustic addition as necessary, multi-media sand filtration, air stripping and carbon treatment. Flows are metered prior to discharge as Outfall 001. Solids are separated in the multi-media filtration system. Outfall 001 is located at the outfall of the carbon treatment system before the waste water is conveyed through a pipe to manhole located along the fence at the southeastern corner of the plant just north of an adjacent railroad. Final discharge is to the Diamond Shamrock tributary west of the State Road culvert. Total flow varies, but is about 30 million gallons per year. Sludge dewatering is accomplished through a filter press, with sludge disposed of at a commercial solid waste landfill.

#### Sanitary Waste Water Treatment Plant

There is one sanitary waste water treatment plant (WWTP) that serves domestic sewage production from the facility. Wastewater from sanitary sources is treated through an equalization tank, trash trap, extended aeration facility, surface sand filtration, and tablet dechlorination prior to discharge as to a manhole as Outfall 601. The package plant discharges to the North-South equalization and settling ponds is further treated with remaining plant waste as described under industrial waste water treatment.

#### Curtain Drain (Ground Water Treatment) Waste Water Treatment

Volatile organic compound (VOC) laden ground water is intercepted along the entire perimeter of the facility via a slurry wall and curtain drain and is collected in the T501 sump. The collected wastewater undergoes air stripping, multimedia filtration, provisions for additional air stripping, and carbon treatment. The discharge joins remaining plant wastewater discharges as Outfall 001.

#### Storm Water Treatment

All storm water within the facility is collected via a series of yard drains and drainage channels and conveyed to a 30,000 gallon retention tank prior to discharge to the North-South settling ponds and is further treated as described under industrial waste water treatment.

#### Observations

Following are observations made during the inspection.

1. The sanitary package plant is rated at 2,000 gpd. The plant was operating and discharging at the time of the inspection. The facility is fitted with alarms.
2. The extended aeration system had acceptable air, good color, and no odor. The blowers were running at the time of the inspection.
3. The clarifier was found in acceptable condition. Return sludge lines were operable.
4. The surface sand filter was overflowing at the time of the inspection, with the west filter overflowing into the east filter. Vegetation was noted in the west filter. The operation of this sand filter and its ability to drain incoming flows must be investigated and sand replaced as needed. Note that sands must meet acceptable gradation as specified by OAC Chapter 3745-42. The filter must be kept free of vegetation. Media removed from the filter must be managed as a solid waste.
5. The chlorine contact tank did not contain any chlorine tablets, but is not required outside of the disinfection season of May through October.
6. The general operation and maintenance of the air stripping, multi-media filtration, and carbon treatment systems appeared to be satisfactory.

7. The general operation of process wastewater sumps, equalization ponds, and chemical neutralization systems appeared satisfactory. The equalization ponds are lined with high density polyethylene (HDPE) and appeared in good condition. Sludge removal was discussed, and occurs annually to every other year.
8. Final outfall composite sampler was collecting composites based upon a flow proportional basis as specified in your NPDES permit Part II-K. Samples are maintained at the proper temperature.
9. Water temperature, color, odor, turbidity, and pH are collected by Gabriel staff. Remaining samples are collected by Gabriel staff and are analyzed by EA Group. Analytical results are reported into the eDMR system by Mr. Workman.

**NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through November 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

**Limit Violations**

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	80082	CBOD 5 day	30D Conc	25	37	1/1/2010
601	80082	CBOD 5 day	30D Conc	25	38	11/1/2009

Please provide a written explanation as to why the WWTP was unable to achieve these limits.

**Reporting Violations**

The following code/reporting violation was noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00530	Total Suspended Solids			AB	1/2/2009

Please provide an explanation as to why the total suspended solids was not recorded in the eDMR for this date.

The following frequency violations were noted for the period reviewed:

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	09/22/2010
001	00530	Total Suspended Solids	1/Week	1	0	09/22/2010
001	50060	Chlorine, Total Residual	1/Week	1	0	09/22/2010
001	00400	pH	1/Week	1	0	09/22/2010
001	00310	BOD	1/Week	1	0	09/22/2010
001	00515	Residue, Total Dissolved	1/Week	1	0	09/22/2010

A response from Gabriel dated October 22, 2010 indicated that you entered the data incorrectly. You must correct the data submission through the eDMR system. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to [James.Roberts@epa.state.oh.us](mailto:James.Roberts@epa.state.oh.us) is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

The following compliance schedule violation is noted for the period reviewed:

Mercury Variance Request: Although Gabriel submitted the mercury variance request to Ohio EPA on May 28, 2010, the request is incomplete without an accompanying NPDES Permit modification request. Ohio EPA notified Gabriel of its requirement to submit the NPDES Permit modification request on August 24, 201, and as of the date of this letter has not received the NPDES Permit modification. NPDES permit changes typically take 180 days to process from date of receipt, and we discussed during the site visit that Gabriel will be under the obligation to comply with its mercury effluent limit limits until it has received an NPDES permit modification that states an alternate limit.

**The NPDES Permit Modification form must be submitted to this office as soon as possible.**

Other Violations

The following additional violations are noted with your NPDES permit:

Failure to Designate an Operator of Record - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. Although you indicated during the inspection that Dennis Woodard is your certified operator for your plant, no official designation has been received by Ohio EPA Central Office. Your treatment plant must have an officially designated operator of record. Gabriel Performance Products, LLC may enter into a contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation thereof provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. To-date, Ohio EPA has not received a contract with an appropriately certified

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operator. The operator of record designation form may be found at [http://epa.ohio.gov/portals/35/opcert/Operator\\_of\\_Record\\_Notification\\_Form.pdf](http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf). The form must be completed and returned to Ohio EPA Central Office, with a copy provided to this office.

Based upon the inspection findings and the overall compliance record of the facility, the Gabriel Performance Products LLC is considered to be in substantial compliance; however the above limit violations should be explained, along with a resolution.

**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 notification, 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

att: Process Flow Diagram, Permit 3IF00002, 11-16-10  
Site Plan, Permit 3IF00002, 11-16-10

File: Industrial/Gabriel Performance Products/PC