



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

May 30, 2008

RE: WAYNE COUNTY
HARSCO COPR.
NPDES# 3IN00181

Mr. Mark Mummert
Corporate Manager, Environmental
Harsco Corporation
P.O. Box 8888
Camp Hill, PA 17055

Dear Mr. Mummert:

On May 29, 2008, this writer met with Steve Thompson to conduct an inspection of the industrial wastewater treatment system in operation on the facility's property. The intent of the inspection was to evaluate operations and maintenance of the treatment system prior to drafting the renewal National Pollutant Discharge Elimination System (NPDES) permit.

We understand Harsco entered the VAP program on June 15, 2001, and is presently conducting ongoing environmental cleanup activities at this site. Although Tricor Industries recently purchased the facility, Harsco Corp. will maintain operations and maintenance of the groundwater recovery system. Harsco Corp. will also maintain responsibility for the NPDES permit and the associated environmental cleanup activities.

The treatment system consists of two wells which are connected to a groundwater recovery system. The groundwater recovery system includes a primary holding tank, two activated carbon stripping units in series and a secondary holding tank. The treatment system appeared to be in good condition and was producing what appeared to be a satisfactory quality effluent. The treatment system discharges to a wetland located north of the treatment building and from there discharges to an unnamed tributary of the Killbuck Creek. At the time of the inspection, the wetland unit appeared to be in good condition. There was no standing water on the site and the final discharge area was dry.

The final effluent (001) sample is currently collected at the sampling tap located immediately after the second activated carbon unit. The influent (800) sample is collected at the influent pipe from the groundwater wells. You indicated that there is rarely a final discharge to the wetland area from the system since most effluent is retained in a holding tank and reused/recycled through the system. You had requested our office to change your NPDES permit sampling frequency to "when discharging" versus the current frequency of "once a month". The "when discharging" alternative may cause problems in SWIMS when running routine compliance checks. This office feels it necessary to maintain the current sampling frequency of once a month.

Mr. Mark Mummert
Harsco Corporation
May 30, 2008
Page 2

A summary of wastewater treatment plant discharge and frequency violations for the period of January 2004 through April 2008 is shown below. If any of the violations noted below are incorrect or inaccurate, please inform this office as soon as possible so the problem may be resolved.

Reporting Violations:

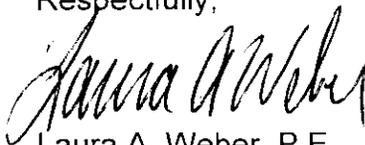
Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2004	001	34496	1,1-Dichloroethane	30D Conc	5	25.2	11/1/2004
November 2004	001	34496	1,1-Dichloroethane	1D Conc	10	25.2	11/10/2004

Frequency Violations:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
November 2004	800	50050	Flow Rate	1/Month	1	0	11/01/2004
November 2004	800	00940	Chloride, Total	1/Month	1	0	11/01/2004
November 2004	001	00400	pH	1/Month	1	0	11/01/2004
November 2004	001	00400	pH	1/Month	1	0	11/01/2004

The renewal NPDES permit for this facility is being drafted and will be public noticed in the near future. You will have 30 days from the date of the public notice to submit comments to Ohio EPA regarding the draft permit. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

Attachment

cc: Rod Beals, Ohio EPA, DERR, NEDO
Loretta Firis, Wayne County Health Dept.

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO

File: Industrial/Rexroth/PC