



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

July 24, 2008

RE: HOLMES BY PRODUCTS
3IK00006
HOLMES COUNTY

Dennis Koshmider
Environmental Compliance Officer
Holmes By-Products
3175 TR. 411, Route 5
Millersburg, Ohio 44654

Dear Mr. Koshmider:

On July 23, 2008, this writer conducted an inspection of your facility to ascertain the status of the closure of the anaerobic lagoon. The lagoon has been significantly lowered by at least 8 to 10 feet along its length. Earlier this year it was discovered when a cooling water line ruptured that it may have been leaking into the lagoon for a lengthy amount of time. It had been thought that groundwater infiltration was responsible for maintaining high liquid levels inside the lagoon. It is now apparent that the leaking line was the cause.

You have lowered the liquid level in the lagoon by land application as well as by treating it through your wastewater treatment plant. The basin that was approved thru PTI 626336 has not been built and may not be needed. Please be advised that the approval of this basin was for a specific purpose. If you choose to build it for a purpose other than its original intent, it may or may not be acceptable. The ability to run the liquid thru your treatment plant is nearing the end as the solids content and the ammonia concentration is increasing. Subsurface injection/land application will be used to further dewater the lagoon as well as natural evaporation. It is thought that that cleanout will begin at the end of August or September 2008. I requested that you do not perform backfilling of the lagoon until I have had the chance to personally observe the lagoon for verification.

In addition to the above, it was noted that odors from Holmes By Products were detected along Route 515. You explained that the vacuum system at the plant was down in the early morning, but had been repaired at the time of my visit (~10:00 am). The water level in the holding basin was elevated, but not unusual for this time of year. It will be drawn down by winter.

DENNIS KOSHMIDER
JULY 24, 2008
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A review of Holmes By Products' compliance history as identified by our SWIMS tracking system for the time period of September 2007 thru June 2008 indicates the following violations:

Numeric

<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
Total Suspended Solids	30D Qty	30.3	89.6325	4/1/2008
CBOD 5 day	30D Qty	30.3	86.9259	4/1/2008

Frequency

<u>Parameter</u>	<u>Sample Frequency</u>	<u>Expected</u>	<u>Reported</u>	<u>Violation Date</u>
Phosphorus, Total (P)	1/Month	1	0	09/01/2007
Oil and Grease, Total	1/Month	1	0	09/01/2007
Nitrogen, Nitrate (NO3	1/2Weeks	1	0	09/01/2007
Nitrogen, Nitrate (NO3	1/2Weeks	1	0	09/15/2007
Phosphorus, Total (P)	1/Month	1	0	03/01/2008
Oil and Grease, Total	1/Month	1	0	03/01/2008
Nitrogen, Nitrate (NO3	1/2Weeks	1	0	03/01/2008
Nitrogen, Nitrate (NO3	1/2Weeks	1	0	03/15/2008

Thank you for your time extended during the inspection of the wastewater facilities and the farm field sites. If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, PE
Environmental Engineer
Division of Surface Water

PPR:bo

File: Industrial/ Permit compliance