



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 10, 2011

RE: GEAUGA COUNTY
NEWBURY TOWNSHIP
KINETICO INCORPORATED
OHIO EPA PERMIT #3IN00268*DD
PRE-PERMIT INSPECTION

Mr. Michael Yaksic, Vice President
Kinetico Incorporated
10845 Kinsman Road
Newbury, OH 44065

Dear Mr. Yaksic:

On November 8, 2010, a pre-permit/compliance inspection was conducted at the above referenced facility. The systems inspected were two domestic wastewater treatment systems and a fire pond system that receives once through/process water discharge and runoff from the surrounding area.

Buildings 1 and 2 are located at 10845 Kinsman Road. According to our files, these buildings employ approximately 175 people with office space, manufacturing, testing, and research and development. The sanitary wastewater is treated by a 7000 gpd tertiary package plant. During the inspection, the wastewater treatment plant was running and appeared to be in satisfactory operation and maintenance condition. The following was noted during the inspection: The return lines from the clarifier to the aeration tank appeared to be pulsing, rather than constantly flowing. Also, the skimmer in the clarifier appeared to be set too low. The surface sand filters were very clean and were freshly raked. The effluent in the disinfection tank appeared clear of visible solids, but contained a small amount of light brown foam.

According to our files, all of the once through testing/process water utilized at 10845 Kinsman Road is collected in trench drains and discharged into a drainage swale leading to the fire pond. This water is generated by valve testing, tank bursting operations, and the backwash from the drinking water treatment unit. There are no additives used in the testing operations.

Building 3, located at 10975 Kinsman Road, employs approximately 70 people with office space, maintenance operations, manufacturing area, and testing area. It's understood that no process wastewater discharges from this site; all test waters are contained in a closed loop system. All of the sanitary wastewater from building 3 is treated by a 4000 gpd tertiary package plant. During the inspection, the plant was running and appeared to be in good operation and maintenance condition. There appeared to be newly installed sand and new rocks around the splash pads in the surface sand filters. The effluent in the disinfection tank appeared to be clear of any visible solids.

Mr. Michael Yaksic
Kinetico Incorporated
January 10, 2011
Page 2

A review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the wastewater treatment plants and the fire pond overflow from January 2009 to January 2011 revealed the following numeric effluent violations:

Permit No	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IN00268*CD	003	Total Suspended Solids	30D Conc	12	14.	6/1/2010
3IN00268*CD	003	Total Suspended Solids	1D Conc	18	24.	6/10/2009
3IN00268*CD	003	Total Suspended Solids	30D Conc	12	24.	6/1/2009

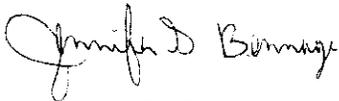
Please be advised that the above mentioned instances of noncompliance are subject to enforcement pursuant to ORC 6111.

Before renewing your NPDES permit, storm water controls need to be evaluated in order to determine whether storm water requirements are needed in the renewal permit. Because there appear to be no external storm water issues, it is directed you complete and submit the enclosed "No Exposure Certification" application form to John Morrison, Ohio EPA Central Office (please send this office a courtesy copy as well). If you qualify for no exposure certification, you are exempt from storm water permit requirements until your facility no longer qualifies for no exposure certification.

Furthermore, before this office can process your renewal NPDES permit, Form 1 and Form 2C shall have an appropriate signature. For a corporation, the signature is required by a principal executive officer of at least the level of vice president. Enclosed are your submitted application forms.

In conclusion, this office cannot process your renewal NPDES permit until we receive a copy of your "No Exposure Certification" application form, and the NPDES renewal forms are returned with the appropriate signature. Also, please inform this office if the documented information from our files (numbers of employees; day to day operations etc.) is still accurate. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/mt

Enclosures