OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

October 23, 2008

RE: THE HALL CHEMICAL CO.
PERMIT NO. 3IE00050
LAKE COUNTY

Ms. Christine Jurcsisn
Safety & Environmental Administrator
28960 Lakeland Boulevard
Wickliffe, OH 44092

Dear Ms. Jurcsisn:

On September 24, 2008, an inspection of the above referenced facility was conducted to obtain and review information for drafting a renewal of the facility's NPDES wastewater permit. The facility was represented by Mr. Brandon K. Smith from BKS Environmental and you. The purpose of the inspection was to: (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. The facility's NPDES permit expired on July 31, 2006.
2. This office received NPDES permit renewal application forms 1 and 2C on July 27, 2006. Form 2C was only partially completed. The accompanying cover letter indicated that the required analytical data to complete form 2C would be submitted within two to four months. To date, this analytical data has not been submitted. Details of the production process and wastewater treatment system should be provided in this application.
3. Mr. Smith indicated during the September 24, 2008 meeting that application form 2C analytical data would be submitted in the near future. The renewal process will begin upon receipt of all the required data. During the renewal process, the facility's existing NPDES permit parameters and permit limits will be evaluated.
4. The treatment system process consists of :
    a. precipitation of metals
    b. filtration
    c. pH neutralization
    d. discharge to Waters of the State
5. The effluent being discharge to outfall 3IE00050**001** was turbid and had a faint white appearance.
6. The sampling point locations for Outfalls 3IE00050**003** and 3IE00050**004** were unknown. Mr. Smith indicated that that he was recently contracted to update the facilities Stormwater Management Plan. He further indicated that it would be a priority to identify the exact locations and sampling points for outfalls 3IE00050**003** and 3IE00050**004**. The Stormwater Management Plan was last updated in 2003.
7. All lab analysis is performed by the on-site lab.
8. Mr. Smith indicated that the facility is set up to submit the facility's NPDES permit data via the Agency's new electronic Web based application.

This office has recently reviewed your self-monitoring reports covering the period September 1, 2005 through September 30, 2008 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of non-compliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01067	Nickel, Total (Ni)	30D Conc	360	465.	9/1/2005
001	01067	Nickel, Total (Ni)	30D Conc	360	469.	12/1/2005
001	01037	Cobalt, Total (Co)	30D Conc	264	801.	12/1/2005
001	01037	Cobalt, Total (Co)	1D Conc	440	801.	12/15/2005
001	01067	Nickel, Total (Ni)	30D Conc	360	876.	1/1/2006
001	61941	pH, Maximum	1D Conc	9.0	9.1	1/10/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	839.5	2/1/2006
001	01037	Cobalt, Total (Co)	30D Conc	264	427.5	2/1/2006
001	01037	Cobalt, Total (Co)	1D Conc	440	469.	2/2/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	376.	4/1/2006
001	00530	Total Suspended Solids	30D Conc	17	21.	5/1/2006
001	01042	Copper, Total (Cu)	30D Conc	31	57.3333	5/1/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	405.666	5/1/2006
001	00530	Total Suspended Solids	1D Conc	28	32.	5/4/2006
001	01042	Copper, Total (Cu)	1D Conc	31	149.	5/4/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	360.2	8/1/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	482.25	9/1/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	383.	10/1/2006
001	01067	Nickel, Total (Ni)	30D Conc	360	461.4	1/1/2007
001	01067	Nickel, Total (Ni)	30D Conc	360	394.4	3/1/2007
001	01037	Cobalt, Total (Co)	30D Conc	264	336.25	8/1/2007
001	01037	Cobalt, Total (Co)	1D Conc	440	494.	8/11/2007
001	01037	Cobalt, Total (Co)	1D Conc	440	485.	10/26/2007
001	01067	Nickel, Total (Ni)	30D Conc	360	366.	11/1/2007
001	01037	Cobalt, Total (Co)	30D Conc	264	313.8	11/1/2007
001	01042	Copper, Total (Cu)	1D Conc	31	38.	11/9/2007
001	01037	Cobalt, Total (Co)	1D Conc	440	526.	11/9/2007
001	01067	Nickel, Total (Ni)	30D Conc	360	393.25	1/1/2008
001	01037	Cobalt, Total (Co)	30D Conc	264	272.2	2/1/2008
001	01067	Nickel, Total (Ni)	30D Conc	360	411.5	4/1/2008
001	01067	Nickel, Total (Ni)	30D Conc	360	360.75	6/1/2008
001	61942	pH, Minimum	1D Conc	6.0	5.6	6/6/2008
001	01037	Cobalt, Total (Co)	30D Conc	264	316.6	8/1/2008
001	61941	pH, Maximum	1D Conc	9.0	9.09	8/15/2008
001	61942	pH, Minimum	1D Conc	6.0	2.36	8/15/2008
001	00530	Total Suspended Solids	30D Conc	17	25.	9/1/2008
001	01037	Cobalt, Total (Co)	30D Conc	264	399.5	9/1/2008
001	00530	Total Suspended Solids	1D Conc	28	50.	9/26/2008
001	01037	Cobalt, Total (Co)	1D Conc	440	840.	9/26/2008

Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
12/22/2005	001	61941	pH, Maximum	1/Week	1	0
3/18/2006	001	50050	Flow Rate	1/Day	1	0
3/19/2006	001	50050	Flow Rate	1/Day	1	0
3/20/2006	001	50050	Flow Rate	1/Day	1	0
3/21/2006	001	50050	Flow Rate	1/Day	1	0
3/22/2006	001	50050	Flow Rate	1/Day	1	0
3/23/2006	001	50050	Flow Rate	1/Day	1	0
3/24/2006	001	50050	Flow Rate	1/Day	1	0
3/25/2006	001	50050	Flow Rate	1/Day	1	0
3/26/2006	001	50050	Flow Rate	1/Day	1	0
3/27/2006	001	50050	Flow Rate	1/Day	1	0
3/28/2006	001	50050	Flow Rate	1/Day	1	0
3/29/2006	001	50050	Flow Rate	1/Day	1	0
3/30/2006	001	50050	Flow Rate	1/Day	1	0
3/31/2006	001	50050	Flow Rate	1/Day	1	0
3/22/2006	001	01042	Copper, Total (Cu)	1/Week	1	0
3/22/2006	001	01092	Zinc, Total (Zn)	1/Week	1	0
3/22/2006	001	01055	Manganese, Total (Mn)	1/Week	1	0
3/22/2006	001	61941	pH, Maximum	1/Week	1	0
2/1/2007	001	01042	Copper, Total (Cu)	1/Week	1	0
2/1/2007	001	01067	Nickel, Total (Ni)	1/Week	1	0
2/1/2007	001	01092	Zinc, Total (Zn)	1/Week	1	0
2/1/2007	001	01055	Manganese, Total (Mn)	1/Week	1	0
2/1/2007	001	01037	Cobalt, Total (Co)	1/Week	1	0
8/1/2007	001	01037	Cobalt, Total (Co)	1/Week	1	0
6/22/2008	001	01042	Copper, Total (Cu)	1/Week	1	0
6/22/2008	001	01067	Nickel, Total (Ni)	1/Week	1	0
6/22/2008	001	01055	Manganese, Total (Mn)	1/Week	1	0
6/22/2008	001	01037	Cobalt, Total (Co)	1/Week	1	0

This office has no record of any data being submitted for outfalls 3IE00050003 and 3IE00050004 for the above referenced time period.

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs).

If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site.

http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html

Please notify this office in writing within 15 days receipt of this letter indicating the reasons for the ongoing permit violations. The letter should also address what actions are going to be taken to prevent the ongoing limit violations listed above from occurring. The letter should contain dates either actual or proposed for completion of the actions.

Please be advised that such instances of non-compliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mlh