



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 31, 2010

RE: WAYNE COUNTY
HYPONEX CORP
NPDES 3IN00166

Mr. Lewis Morris, Jr., Office Manager
Hyponex Corp.
3875 S. Elyria Road
Shreve, Ohio 44676

Dear Mr. Morris:

On March 9, 2010 this writer, along with Dean Stoll of this office, conducted an inspection of the sewage treatment plant serving your facility and the industrial mining operations conducted by your facility. The inspection was conducted to review operations at the facility as a follow up to preliminary stream analysis by this office in which low dissolved oxygen levels were noted downstream of your facility. In addition, this office reviewed compliance with your National Pollutant Discharge Elimination System (NPDES) permit.

The Hyponex Corporation, a subsidiary of The Scotts Company, is located on an approximately 570 acre parcel. The facility is currently a Class II Compost Facility and has acquired all appropriate permits with the U.S. Army Corps of Engineers and the Division of Solid and Infectious Waste. It is understood the facility is currently permitted to harvest peat on 166 acres of the property. The mining process involves drying the peat, mixing the peat with various composting materials and bagging the finished product.

INSPECTION:

Sanitary Wastewater Treatment Plant:

At the time of the inspection, all treatment units were in service and the effluent being produced appeared to be clear. The mixed liquor in the aeration tank was a light brown color and provided with adequate air circulation. The return sludge line was in operation at the time of the inspection and returning a medium brown which indicates a good population of microbes necessary for adequate treatment. One blower was operating at the time of the inspection and the rollover within the aeration tanks appeared to be satisfactory. The clarifier was in satisfactory condition with no visible solids collecting on the surface or the tank or on the weirs and effluent trough. The skimmer was visible and appeared to be in satisfactory operation. The alarm system for the dosing pumps

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was checked and found to be satisfactory. The sand filters were covered and there was no debris or vegetation present at the time of the inspection. If sand filter media is to be replaced, please note that Ohio EPA requirements for filter sand are that it has a uniformity coefficient not greater than 3 and an effective size between 0.4-1.0 mm. The final outfall 002 was found to be free of solids and no impact on the drainage way was visually apparent at the time of the inspection.

Industrial Process:

The facility is currently permitted to discharge from a sedimentation basin pond tributary to outfall 001. The NPDES permit contains limitations for pH and total suspended solids at outfall 001. It is understood the facility is proposing to eliminate this sedimentation basin and utilize Best Management Practices (BMP) located in the Storm Water Pollution Prevention Plan. The existing sedimentation pond was designed to treat water that was in contact with the mining operations prior to discharging to the Kiser Ditch. It is understood that water from cells northeast of Kiser Ditch were pumped from the harvested cell to the adjacent downstream cell and this process was repeated until the water reached the sedimentation basin.

Please be aware, the BMP's proposed in the Stormwater Management Plan are efficient for a ½ acre/100 lineal feet drainage area with slop of 2% or less. Please note, the doubling up of any particular BMP is not an allowed practice. After review of the proposal to remove the sedimentation basin from the NPDES permit, the Ohio EPA recommends the facility maintain a sedimentation pond as a final BMP. To remove solids from the discharge, the effluent must have an adequate settling time that can be obtained in a sedimentation pond. If the sedimentation pond must be moved, the NPDES permit can be adjusted accordingly.

The inspection of the manure composting area revealed the area to be satisfactory with limited runoff noticed. A wide vegetative strip is located downgrade of the composting area to prevent impacts to surface water bodies.

Following the inspection, the facility compliance record was reviewed. The review period was from January 1, 2008 through March 1, 2010 and revealed the following violations for outfall 602:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2008	602	CBOD 5 day	30D Conc	10	19.8	2/1/2008
February 2008	602	CBOD 5 day	1D Conc	15	19.8	2/7/2008
March 2008	602	CBOD 5 day	30D Conc	10	12.7	3/1/2008

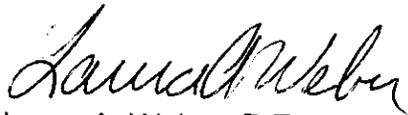
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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2008	602	CBOD 5 day	1D Conc	15	22.2	5/1/2008
May 2008	602	CBOD 5 day	30D Conc	10	56.1	5/1/2008
May 2008	602	CBOD 5 day	1D Conc	15	90.	5/8/2008
May 2008	602	Fecal Coliform	1D Conc	2000	12000.	5/1/2008
May 2008	602	Fecal Coliform	30D Conc	1000	8625.54	5/1/2008
May 2008	602	Fecal Coliform	1D Conc	2000	6200.	5/8/2008
September 2008	602	Fecal Coliform	30D Conc	1000	1400.	9/1/2008
May 2009	602	Fecal Coliform	30D Conc	1000	2500.	5/1/2009
May 2009	602	Fecal Coliform	1D Conc	2000	2500.	5/21/2009
February 2009	602	Total Suspended Solids	30D Conc	12	12.45	2/1/2009
February 2009	602	Total Suspended Solids	30D Qty	0.10	.11075	2/1/2009
February 2009	602	Total Suspended Solids	1D Conc	18	20.9	2/12/2009
February 2009	602	Total Suspended Solids	1D Qty	0.068	.11075	2/12/2009

This office has no follow up correspondence regarding the above noted violations. Please review the above noted violation list and submit a written summary of the potential causes for the violations. All other data reported on the discharge monitoring reports appeared to be in compliance with the NPDES permit.

Should you have any comments or questions 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

cc: Ken Eng, Wayne County Health Dept.
Robert Kastner, P.E., Wayne County Soil and Water Conservation District

File: Industrial/Hyponex/Permit Compliance