



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Erie County
Automotive Components Holdings, LLC
Sandusky Plant
NPDES

January 3, 2008

Mr. Richard Frasca, Environmental Engineer
Automotive Components Holdings, LLC
Sandusky Plant
3020 Tiffin Avenue
Sandusky, OH 44870

Dear Mr. Frasca:

On December 11, 2007, a visit was made prior to beginning the renewal of the Automotive Components Holdings NPDES permit, which expired December 31st. Discharges are manually released and vary up to 6.8 million gallons of stormwater mixed with effluent from the industrial waste treatment plant, which batch treats 60,000 gallons of oily washwater approximately 2X/week. At the time of my visit we observed an oil sheen on outfall 001 prior to entering Schoewe Ditch. We spent much of the visit discussing the likely causes of total suspended solids (TSS) and oil & grease NPDES permit violations along with proposed resolutions. Monthly operating reports have revealed intermittent violations, which we believe can be addressed during the next permit cycle. My comments and recommendations are as follows:

1. The presence of a visible oil sheen on the discharge is an Ohio water quality standard violation of the "general effluent limitations" of your NPDES permit. An oil sheen was also noted during my last inspection, making this and the violations a cause for concern. I believe the logical source of the sheen and violations is the industrial waste treatment plant, which treats primarily oily washwater from the plant, and commingles with the stormwater discharge. Since connection to municipal sanitary sewers is the most environmentally sound, and always our first option to best serve any source, we intend to include a schedule of compliance in the renewal permit requiring connection to the Erie County/ City of Sandusky municipal sewer system at SR 101. We will provide three years in order to allow for budgeting, engineering and securing all permits for the project.
2. Following an explanation of how the stormwater collection system operates, we both agreed the cause of TSS violations was the design and draw point from the system.

Mr. Richard Frasca, Environmental Engineer

January 3, 2008

Page 2

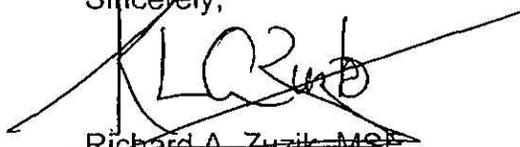
As currently composed the stormwater collection system interconnects with the onsite quarry and under normal operating conditions recirculates with no discharge. Up to 12 million gallons of water per day is continuously drawn from the quarry, primarily for non contact cooling operations, and discharged back into the system. Only when the water level rises in the entire system is it necessary to release excess water. All water flows through a small retention pond, which acts as an overflow point and is monitored at Outfall 001 prior to entering Schoewe Ditch. Due to the high hydraulic flow through the small pond there is little or no detention, and thus the elevated TSS discharges. Upwards of 110 mg/l TSS have been reported.

I proposed relocating the discharge point from the system to the quarry in order to take advantage of its natural large detention capacity. This is the typical arrangement found at all active stone quarry operations to handle stormwater. It would be necessary to install a duplex, submersible pumping arrangement which draws beneath the surface where it is more quiescent, and suspended solids negligible. The best outlet location can be determined at a later date. We feel this project can be completed within 5 years, just prior to the expiration date of the renewal. This requirement would also be included in a schedule of compliance.

I indicated to you that the TSS limits of 65 mg/l monthly average and 90 mg/l weekly average have been inappropriately applied. I am unable to explain why these limits were originally applied, as they are normally reserved only for sanitary lagoon systems. Therefore, once the new release point is in place at the quarry, the TSS limits will be reduced to 30 mg/l monthly average and 45 mg/l weekly average to conform to current policy. We will also be reevaluating the sampling frequencies utilizing the enclosed permit guidance document for industrial facilities.

You will be receiving a "draft" copy of the renewal in the near future for your review, since there will be many changes, please review it carefully, as you will have a 30-day period in which to comment. Once issued final, it will remain effective for another five year period. Please continue to operate under the current permit until the renewal becomes effective. If you have any questions or any of the above is incorrect or in error, please feel free to call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us.

Sincerely,


~~Richard A. Zuzik, MSE~~
Division of Surface Water

/llr

pc: Jack Meyers, P.E. Erie Co. DES
Rich Sinwald, Sandusky Industrial Inspector
DSW-NWDO File

2IC00013*JD September 2003	001	00530	Total Suspended Solids	30D Conc	65	82.	9/1/2003
2IC00013*JD June 2004	001	00530	Total Suspended Solids	30D Conc	65	81.	6/1/2004
2IC00013*JD July 2005	001	00530	Total Suspended Solids	30D Conc	65	110.	7/1/2005
2IC00013*JD July 2005	001	00530	Total Suspended Solids	7D Conc	90	110.	7/22/2005
2IC00013*JD March 2006	001	00550	Oil and Grease, Total	1D Conc	10	12.	3/9/2006
2IC00013*JD June 2006	001	00530	Total Suspended Solids	30D Conc	65	89.	6/1/2006
2IC00013*JD June 2006	001	00550	Oil and Grease, Total	1D Conc	10	14.1	6/23/2006
2IC00013*JD November 2006	001	00550	Oil and Grease, Total	1D Conc	10	12.4	11/3/2006
2IC00013*JD January 2007	001	00530	Total Suspended Solids	30D Conc	65	105.	1/1/2007
2IC00013*JD January 2007	001	00530	Total Suspended Solids	7D Conc	90	105.	1/1/2007
2IC00013*JD May 2007	001	00530	Total Suspended Solids	30D Conc	65	98.5	5/1/2007
2IC00013*JD May 2007	001	00530	Total Suspended Solids	7D Conc	90	98.5	5/22/2007
2IC00013*JD May 2007	001	00550	Oil and Grease, Total	1D Conc	10	12.7	5/23/2007