



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kerfesski, Director

Re: Erie County
Groton Township
NPDES Permit

January 4, 2011

Mr. Blake Silkwood, Operations Manager
Hanson Aggregates Midwest, Inc.
Sandusky Quarry
9220 Portland Road
Castalia, Ohio 44824

Dear Mr. Silkwood:

On December 21, 2010, a visit was made in conjunction with the renewal of the NPDES Permit, which expired December 31, 2010. Rolland Krueger was present and provided information on plant operations, we also discussed permit compliance issues, and inspected the outfalls. At the time of my visit, outfall 001 was not being used, and outfall 002 appeared clear, with no indication of residuals in Pipe Creek.

The current permit incorporated new outfall 002 to Pipe Creek, as well as additional monitoring requirements due to the City of Sandusky concerns at the emergency water intake downstream in Sandusky Bay. There were no reported concentration limit violations at either outfall for the past five years, however, Hanson has been in noncompliance with a majority of the additional monitoring/reporting requirements set forth in Part 2, Items F and G. of the NPDES permit. Deficiencies are as follows:

- 31 RZ
- 1) Item F required annual reports no later than January 15th of the subsequent year summarizing activities at outfall 002. Annual reports were received for 2006 and 2007. Reports for 2008 and 2009 were not submitted. The 2010 report is due by January 15, 2011. I informed Mr. Krueger to include the missing annual summaries in the 2011 report. There has been only one reported event, in August 2007, when Sandusky called to request discharges cease, but the outfall was not in use. I later spoke to Doug Keller, Sandusky Water Plant Superintendent, who informed me that the current notification system is satisfactory.

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- 2) Item G required bi-annual (1 every 2 years) sampling during the month of June beginning in 2006 at outfall 002 for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury and Silver. We received notification that the 2006 sampling was not conducted since the new outfall was not yet in service. However, the 2008 and 2010 samples were also not done, which Mr. Krueger attributed to administrative failure. Since we were unable to evaluate background concentration levels of the noted parameters, the bi-annual sampling requirement will be maintained in the renewal, as well as a condition to sample even if the outfall is out of service during the month of June. Please ensure all internal actions are taken to schedule the three required sampling events during the upcoming five-year permit cycle.

In the near future you will be receiving a draft copy of the NPDES permit renewal. You should review it carefully, as there is a 30-day comment period to respond to any permit conditions. Once issued as a final document, it will remain in effect for another five-year period.

If you have any questions, or any of the above is incorrect, please call me at (419) 373-3020, or email at rick.zuzik@epa.state.oh.us.

Sincerely,



Richard A. Zuzik, MSE
Division of Surface Water

/cs

pc: Jim Smith, Environmental Manager
DSW, NWDO File