

**Environmental
Protection Agency**

Commissioner, Governor
Mark DeWine, Lt. Governor
Richard Cordray, Director

August 17, 2011

RE: LIBERTY TIRE SERVICES OF OHIO
3IN00203*DD
STARK COUNTY

Mr. Bryan Jones
General Manager
Liberty Tire Services, LLC
14864 Lincoln Street SE
Minerva, Ohio 44657-8548

Dear Mr. Jones:

On August 10, 2011 this writer conducted an inspection of your facility for the purpose of gathering information necessary to renew the above referenced NPDES Permit, which will expire on January 31, 2012. You accompanied me during the inspection. The following is a summary of the visit:

General

Liberty Tire processes scrap tires for landfill in an on-site tire mono fill and for recycling. It is our understanding that tires are shredded for recycle for end use such as drainage layers, playground and landscaping mulch. One on-site well provides process water. Sanitary sewers are present.

Wastewater Generated

- Contact cooling water to cool the shredder knives
- Stormwater
- Leachate from the tire pilot landfill
- Leachate from the tire mono fill

Inspection Observations

- 1) A new shredder has been installed on a concrete pad that will soon be the base for a new building under construction, which will house the shredder. The old shredder has been replaced and the building that once housed it, will become a maintenance shop.
- 2) The new shredder reportedly uses substantially less water to cool the knives and evaporates before hitting the ground. You stated that there will no longer be a discharge of cooling water. If this is true then the renewal application should be

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amended to remove reference to cooling water in section II, B of the 2C application. If for some reason excess water is generated in the future, provisions should be made to collect this water and discharge it to the sanitary sewers before the building is finished. Approval will be needed from the Minerva WWTP.

- 3) The valved discharge from the pilot landfill has been hard piped to pond 1. This was done because an oily discharge was found emanating from an adjacent 6 inch black corrugated pipe. A picture of this location is attached. Reportedly, the oily discharge has been small and sporadic, but its existence has not been explained. We request that you summarize any and all information your company has on this issue and submit it to this office **no later than September 16, 2011**.
- 4) The discharge from Pond 1 is over a rip rap type outfall, not a standard pipe. Picture attached. This can make it difficult to obtain a proper sample. You were requested to watch the lab performing the sampling and let this writer know how it is gathered.

2C application comments

- 1) Part V, A must be completed for all the parameters for each outfall.
- 2) Part V, B must also be completed. You must mark the pollutant believed present or absent. You only need to provide an analysis if you mark believed present.
- 3) As mentioned above, if cooling water needs to be discharged it should be routed to the sanitary sewer, and removed from the application.

The above listed revisions to the application should be submitted as soon as possible but no later than September 16, 2011.

A review of your compliance history for the time period of October 2009 through June 2011 revealed the following violation of your NPDES permit:

Numeric Violation

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.47	3/8/2011

Frequency Violations

None

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I attempted to review your Stormwater Pollution Prevention Plan (SWPPP), but it could not be located during the visit. **We request that you submit a copy of the SWPPP no later than October 16, 2011.**

If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136 or by e-mail at phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt

Attachments

cc: Joshua Adams, Ohio EPA, NEDO, DSIWM

File: Industrial Permit\Compliance

Drain from pilot landfill



Outlet from Pond 1

