



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

November 2, 2009

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

Mr. Dave Daley  
Operations Manager  
Liberty Tire Services, LLC  
14864 Lincoln Street SE  
Minerva, Ohio 44657

Dear Mr. Daley:

On October 22, 2009 this writer conducted a compliance evaluation inspection of your facility for the purpose of determining compliance with the above referenced NPDES permit. You accompanied me during the visit. The following represents a summary of the inspection:

- 1) Cooling water for the shredders is still exiting the building and flowing across the access road. The pipe containing the water in front of the building may be broken as it appears the water is seeping out of the ground. Please refer to the attached picture.
- 2) The 60 day NPDES permit has been expired. It was issued effective on May 14, 2009. Pond 2 has not been completely emptied and sediments removed. You explained that while the pond had been drawn down, it could not be emptied due to continual rainfall. Please refer to the attached picture.
- 3) A new building is proposed for construction yet this year. We discussed the opportunity to make changes concerning the collection of cooling water. One option discussed would be to install a 100% recycle system to eliminate the discharge of this contact cooling water.
- 4) An attempt has been made to install a sediment trap west of Pond 2. Please refer to the attached picture.

A review of your compliance history for the time period of October 2007 through September 2009 revealed the following violations of your NPDES permit:

**Numeric Violation**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.49	5/5/2009

**Frequency Violations**

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	00335	Chemical Oxygen Demand	1/2Weeks	1	0	12/15/2007
601	00680	Carbon, Total Organic	1/2Weeks	1	0	12/15/2007
601	00335	Chemical Oxygen Demand	1/2Weeks	1	0	07/01/2008
601	00680	Carbon, Total Organic	1/2Weeks	1	0	07/01/2008

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**Action Items**

- 1) We discussed the need to maintain Pond 1 and 2. Both need to be emptied and the accumulated soils removed to provide the original design capacity. We also discussed changes that should be made to Pond 2 and Pond 1 to make them more efficient in removing suspended solids. For example a fore bay should be added to facilitate cleanout; the pond might be reconfigured to maximize the distance between the inlet and outlet; the outlet structure modified to draw off below the water surface.
- 2) All of the contact cooling water must be routed into Pond 2 as described in your last NPDES permit application.
- 3) A rock check dam should be installed in the sediment trap that has been installed upstream of Pond 2. At this time the trap is not effective as the large culvert pipe underneath the road is just transferring sediment to Pond 2. Please refer to the attached picture.
- 4) The water and the soils in Pond 2 and the runoff from the fire suppressant water earlier this year still needs to be resolved.

We request that you respond in writing to this office no later than November 16, 2009 with your intentions to address the above listed action items. If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136.

Sincerely,



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

PPR/mt

Attachments

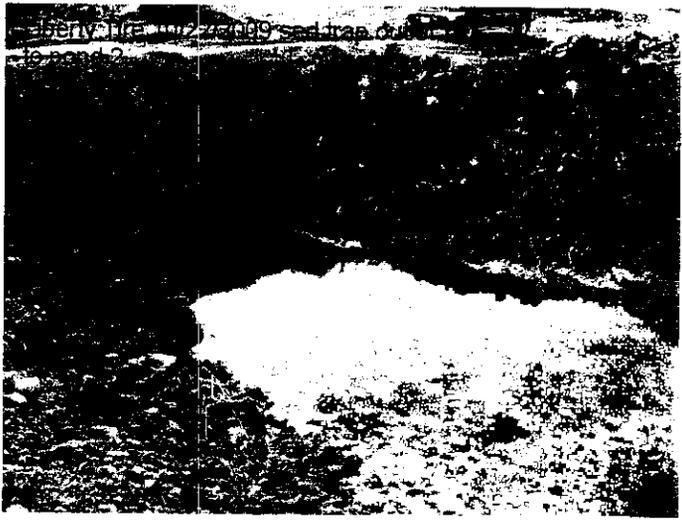
cc: Joshua Adams, DSIWM, NEDO

File: Industrial Permit\Compliance



Liberty Tire 10/22/2009 Pond 2





Over view of site

