



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 29, 2007

RE: ASHTABULA COUNTY
MILLENNIUM CHEMICALS - PLANT 1
OHIO EPA PERMIT NO. 3IE00013
NPDES PERMIT NO. OH0000523

Mr. Rick Hughes
Environmental Superintendent
Millennium Inorganic Chemicals, Inc.
2900 Middle Road
Ashtabula, OH 44004

Dear Mr. Hughes:

On August 13, 2007, a pre-permit inspection was conducted at the above referenced facility by the undersigned. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the facility's treatment processes and effluent discharge quality at the respective outfalls.

At the time of the inspection, the plant was observed to be in good working order. The effluent appeared clear. Review of the monthly operating reports for the period of May 2003 through July 2007 shows the following violations:

Limit Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2004	003	pH, Maximum	1D Conc	9.0	10.	10/19/2004
June 2005	003	pH, Minimum	1D Conc	6.5	6.	6/1/2005
September 2005	003	Total Suspended Solids	30D Conc	25	34.9090	9/1/2005
September 2005	003	Total Suspended Solids	30D Qty	426	427.936	9/1/2005
September 2005	003	Total Suspended Solids	1D Conc	62	124.	9/13/2005
September 2005	003	Total Suspended Solids	1D Qty	1058	1359.20	9/13/2005
September 2005	003	pH, Minimum	1D Conc	6.5	6.	9/28/2005
January 2006	003	Total Suspended Solids	30D Conc	25	27.68	1/1/2006
March 2006	003	pH, Maximum	1D Conc	9.0	11.	3/9/2006
March 2006	003	pH, Minimum	1D Conc	6.5	6.2	3/9/2006
March 2006	003	pH, Minimum	1D Conc	6.5	6.4	3/12/2006
March 2006	003	pH, Maximum	1D Conc	9.0	9.6	3/13/2006
July 2007	003	Total Suspended Solids	30D Conc	25	33.8333	7/1/2007
July 2007	003	Total Suspended Solids	1D Conc	62	76.	7/27/2007

Mr. Rick Hughes
 Millennium Inorganic Chemicals, Inc.
 August 29, 2007
 Page 2

Code Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2004	003	Flow Rate			AD	8/29/2004
August 2004	003	Flow Rate			AD	8/30/2004
August 2004	003	Flow Rate			AD	8/31/2004
September 2004	003	Flow Rate			AD	9/1/2004
September 2004	003	Flow Rate			AD	9/2/2004
September 2004	003	Flow Rate			AD	9/3/2004
September 2004	003	Flow Rate			AD	9/4/2004
September 2004	003	Flow Rate			AD	9/5/2004
September 2004	003	Flow Rate			AD	9/6/2004
September 2004	003	Flow Rate			AD	9/7/2004
September 2004	003	Flow Rate			AD	9/8/2004
April 2007	003	Flow Rate			AB	4/9/2007
April 2007	003	pH, Maximum			AB	4/9/2007
April 2007	003	pH, Minimum			AB	4/9/2007
April 2007	003	Flow Rate			AB	4/10/2007
April 2007	003	pH, Maximum			AB	4/10/2007
April 2007	003	pH, Minimum			AB	4/10/2007
April 2007	003	Flow Rate			AB	4/11/2007
April 2007	003	pH, Maximum			AB	4/11/2007
April 2007	003	pH, Minimum			AB	4/11/2007
April 2007	003	Flow Rate			AB	4/12/2007
April 2007	003	pH, Maximum			AB	4/12/2007
April 2007	003	pH, Minimum			AB	4/12/2007
April 2007	003	Flow Rate			AB	4/13/2007
April 2007	003	pH, Maximum			AB	4/13/2007
April 2007	003	pH, Minimum			AB	4/13/2007

Frequency Violations

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
April 2004	4/1/2004	003	Strontium, Total Recov	1/Month	1	0
April 2004	4/8/2004	003	Total Suspended Solids	1/Week	1	0
April 2004	4/8/2004	003	Nickel, Total Recovera	1/Week	1	0
April 2004	4/8/2004	003	Zinc, Total Recoverabl	1/Week	1	0
April 2004	4/8/2004	003	Chromium, Total Recove	1/Week	1	0
April 2004	4/8/2004	003	Copper, Total Recovera	1/Week	1	0
April 2004	4/8/2004	003	Residue, Total Filtera	1/Week	1	0
June 2004	6/1/2004	003	Fluoride, Total (F)	1/Month	1	0
March 2006	3/1/2006	003	Total Suspended Solids	1/Week	1	0

Mr. Rick Hughes
Millennium Inorganic Chemicals, Inc.
August 29, 2007
Page 3

March 2006	3/1/2006	003	Nickel, Total Recovera	1/Week	1	0
March 2006	3/1/2006	003	Zinc, Total Recoverabl	1/Week	1	0
March 2006	3/1/2006	003	Chromium, Total Recove	1/Week	1	0
March 2006	3/1/2006	003	Copper, Total Recovera	1/Week	1	0
March 2006	3/1/2006	003	Residue, Total Filtera	1/Week	1	0
February 2007	2/1/2007	901	Water Temperature	1/Month	1	0
March 2007	3/15/2007	003	Total Suspended Solids	1/Week	1	0
March 2007	3/15/2007	003	Nickel, Total Recovera	1/Week	1	0
March 2007	3/15/2007	003	Zinc, Total Recoverabl	1/Week	1	0
March 2007	3/15/2007	003	Chromium, Total Recove	1/Week	1	0
March 2007	3/15/2007	003	Copper, Total Recovera	1/Week	1	0
March 2007	3/15/2007	003	Residue, Total Filtera	1/Week	1	0

In addition to the above, there were several frequency violations in 2003 and some early 2004 primarily for pH. However, the problem was rectified by mid 2004 and has not been an issue since.

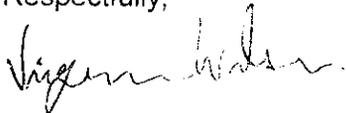
The NPDES renewal application was also reviewed. The following items should be addressed prior to renewing the permit:

1. The line drawing for the flow in the plant should note the location of the outfalls that are tested.
2. Form 2F, Section IV Part A should include the drainage area information requested in this section.

Based on the inspection findings and the overall compliance record of the facility, the facility is considered to be in substantial compliance, therefore, this office anticipates drafting and public-noticing the renewal permit for public review and comment after receiving the above revisions to the application. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1180.

Respectfully,



Virginia Wilson, P.E.
Geological Engineer
Division of Surface Water

VW/mt

File: Industrial/Millennium Plant 1/Permit & Compliance