



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

August 29, 2007

RE: ASHTABULA COUNTY
MILLENNIUM CHEMICALS - PLANT 2
OHIO EPA PERMIT NO. 3IE00017
NPDES PERMIT NO. OH000493

Mr. Rick Hughes
Environmental Superintendent
Millennium Inorganic Chemicals, Inc.
2426 Middle Road
Ashtabula, OH 44004

Dear Mr. Hughes:

On September 26, 2006, an inspection was conducted at the above facility by the undersigned, Mr. Kris Coder of Ohio EPA DHWM and representatives from U.S. EPA. The purpose of the inspection was to review the treatment processes at the facility and the compliance with the 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. This inspection is being used as the compliance pre-permit inspection for the NPDES renewal application received January 30, 2007.

At the time of the inspection, the northern part of the plant had high water levels. The sample box needed cleaned and a new type of thermometer was needed. Otherwise, the plant was observed to be in good working order both on the south and north. Review of the monthly operating reports for the period of May 2003 through July 2007 shows the following violations with respect to the facility's limits:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2004	601	Total Suspended Solids	30D Conc	30	32.5	2/1/2004
February 2005	601	Total Suspended Solids	1D Conc	45	54.	2/1/2005
October 2005	003	pH, Maximum	1D Conc	9.0	10.	10/4/2005
April 2007	601	CBOD 5 day	1D Conc	40	53.	4/3/2007
April 2007	601	Total Suspended Solids	1D Conc	45	49.	4/30/2007

In addition to the above, there were several violations for frequency requirements. However, there have not been any since 2004.

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.

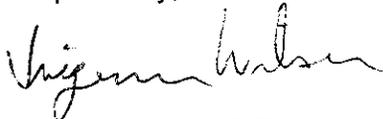
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2. Form 2F, Section IV Part A should include the drainage area information requested in this section.

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 2/Permit & Compliance