



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 10, 2009

RE: Ashtabula County
Millennium Inorganic Chemicals Plant 2
Ohio EPA Permit No. 3IE00017
NPDES Permit No. OH0000493
Compliance Evaluation Inspection

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

Dear Mr. Hughes:

On February 18, 2009, a limited-scope Compliance Evaluation Inspection was conducted at Millennium Inorganic Chemicals Plant 2 by the undersigned. A follow-up visit to EU-8 was performed on March 12, 2009 with Mr. Greg Orr. In addition to you, Millennium was represented by Mr. Greg Meyers, Environmental Engineer. The purpose of the inspections was to evaluate the facility's compliance with the terms and conditions of the NPDES permit. Evaluations were conducted of the chemical neutralization system, sanitary treatment systems, Station 603, and the Outfall 003 discharge to Lake Erie.

At the time of the inspections, the following observations and comments were noted:

1. As a whole, the general operation and maintenance of the chemical neutralization wastewater treatment system appeared to be satisfactory. However, it appears that the existing clarifier may not have the capacity to adequately handle existing plant flows. A significant segment of the weir trough was flooded even though the flow meter at Outfall 003 was registering 3.9 MGD, below the permitted flow rate of 4.4 MGD.

A February 5, 2009 e-mail to Ms. Virginia Wilson requested "permission to bypass the neutralizing tanks and clarifier with the flow from Oxide only during periods of clarifier upset, estimated to be 6-8 weeks per year on an as needed basis. During these periods of bypass, we would maintain compliance with current permit limits at outfall 003." At this time, such a request can neither be considered nor granted.

2. The review of the respective sanitary treatment systems serving the TiO₂ Plant and TiCl₄ Plant revealed the general operation and maintenance to be satisfactory.

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3. A visual observation of the 003 discharge into the pipeline, as well as the CEI tunnel discharge, revealed no signs of floating debris, oil & grease, or foam in the effluent.

A review of the Discharge Monitoring Reports received by Ohio EPA for the period January 2008 through February 2009 noted the following violations of the final effluent limitations contained in the NPDES permit:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2008	601	Total Suspended Solids	1D Conc	45	72.	2/7/2008
May 2008	602	Total Suspended Solids	1D Conc	45	58.	5/13/2008
March 2008	003	pH, Minimum	1D Conc	6.5	5.1	3/26/2008
March 2008	601	Total Suspended Solids	1D Conc	45	52.	3/4/2008
January 2009	602	Total Suspended Solids	1D Conc	45	55.	1/8/2009
January 2009	602	CBOD 5 day	1D Conc	40	90.	1/21/2009
January 2009	602	CBOD 5 day	30D Conc	25	45.	1/1/2009

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

If there are any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt