

**Environmental
Protection Agency**

Commissioner, Governor
Lt. Governor
Director

December 23, 2010

RE: NELSON STUD WELDING
PERMIT NO. 3IS00040
LORAIN COUNTY
ELYRIA

Mr. Jeff Snelly
Process Tool Engineer
Nelson Stud Welding
7900 West Ridge Rd.
P.O. Box 4019
Elyria, Ohio 44036-2019

Dear Mr. Snelly:

On November 23, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Scott Spreng, Manager of Human Resources and you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with 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 inspection, the following items were noted/discussed:

1. Quest Consultants remains the current operator of the treatment system. Quest Consultants is also responsible for collecting the effluent samples. The lab analysis is performed by Spencer WWTP.
2. Mr. Scott Spreng submits the data to Ohio EPA's electronic discharge monitor reporting (e-DMR) system
3. Mr. Spreng indicated that the treatment system is currently serving approximately 122 employees (62 hourly and 60 salary).
4. Currently the plant has been averaging 1692 gpd since August 1, 2009 with a maximum reported flow of 5002 gpd which occurred on October 5, 2010.
5. Mr. Spreng reported that Burnett's Septic hauled 3,000 gallons of sludge to French Creek WWTP in the fall of 2010.
6. The influent appeared to have a grayish white cast. This is not typical. This should be investigated to insure that something is not being improperly disposed into the treatment system.
7. The blowers were running and the plant was receiving good aeration.
8. The contents of the aeration tank were medium to light brown. A medium brown color is more typical of a properly operating plant. No foam was present in the tank.

9. The sludge return line was functioning properly and returning medium to light brown water.
10. The skimmer return line was functioning properly and returning clear water.
11. The weirs and the sidewalls in the settling tank were free of solids.
12. Minimal vegetation was present in the surface sand filter beds. The beds should be maintained free of all vegetation.
13. Both the chlorination and dechlorination dispensing tubes were not evaluated. Disinfection is only required from May 1st through October 31st
14. The effluent was clear.
15. No visual impact to the receiving stream was observed.
16. A proposed ultra violet disinfection system still remains on hold due to the current economic climate.
17. Both the flow meter and chart recorder were last calibrated on February 3, 2010 by Control Associates.
18. The battery back-up and surge protection for the above units was replaced in May 2010.
19. Currently the facility has an active NPDES permit for sanitary waste and an expired general stormwater permit. The option of combining the two permits was discussed. In order to combine the permits, the facility would need to request to modify the existing NPDES permit referenced above to include Parts IV, V, and VI, which contain the stormwater language. This request would require the submission of the following:
 - A. NPDES modification request form
 - B. Application form 2F
 - C. Antidegradation Addendum
 - D. A modification request fee of \$ 200.00 dollars
20. If the facility wishes to maintain the two permits separately, a \$350.00 dollar application fee should be submitted immediately in order to renew the facility's general stormwater permit. However, it should be noted that this general permit will expire May 31, 2011 and an additional \$350.00 dollar renewal fee will be required.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2009 through November 30, 2010 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

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LIMIT VIOLATIONS

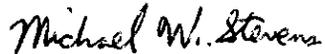
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residue	1D Conc	0.019	.17	6/2/2010
001	50060	Chlorine, Total Residue	1D Conc	0.019	.17	6/17/2010

No frequency violations were noted.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt

Enclosure: Business Card