Environmental
Protection Agency

, Governor
Lt. Governor
, Director

October 12, 2010

RE: PET PROCESSORS, LLC
NPDES PERMIT NO. 3IF00009
LAKE COUNTY
1350 BACON ROAD

Mr. David Davis
Quality Engineer
PET Processors, LLC
1350 Bacon Road
Painesville, OH 44077

Dear Mr. Davis:

On September 23, 2010, this writer conducted a compliance evaluation inspection of the wastewater treatment plant serving the above referenced facility. The purpose of the inspection was to evaluate the wastewater treatment plant's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. Below you will find a summary of the inspection.

General

PET Processors receives low molecular weight polyester chips and reprocesses them to meet customer end use specifications. Operational hours are 24 hours per day, seven days per week, and 52 weeks per year. There are two twelve hour shifts. Approximately 90 people are employed at the facility.

Wastewater

Outfall	Wastewater generated	Treatment provided
601	Sanitary wastewater	Grinder pump, trash trap, flow EQ, 7,728 gpd extended aeration plant, surface sand filters, UV disinfection.
603	Once thru Non-contact cooling water, fire tank draining, rail car wash of interior, boiler blow down	none
604	Backwash from filters used to remove solids from Lake Erie intake	Settling in the old ash pond
605	Air scrubber for Extruder Line 1, water from periodic dumping of contents of and spillage from contact cooling bath for extruded plastic	Above ground oil/water separator
001	601,602,603,604, and 605	Not applicable
588	Sludge station	

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

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Inspection Observations

At the time of the inspection, no significant problems were noted. The following was observed:

- The sanitary sewage plant was producing an effluent (Internal station 601) of satisfactory visual quality in that there was no evidence of debris, oil or grease. The aeration tank content was chocolate brown in color. The settling tank content was turbid. The skimmer was submerged and should be situated at the level of the water surface. The west filter bed contained some vegetation and sludge. The vegetation, sludge and top layer of solids laden sand must be removed. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on the bed. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed. Also, the filter beds contained overflow risers. These risers are not a part of the approved design of the sewage plant and must be removed.
- The rail car area (northwest side of property) did contain spilled raw material (plastic). This should be removed before it enters any storm water sewers.
- At Internal Station 604, an excessive amount of overgrown vegetation was blocking the path to the effluent discharge. This is a potential safety hazard that must be corrected. The vegetation must be cut back. Also, any vegetation preventing or interfering with one's ability to obtain a representative sample of the discharge must be removed.
- Outfall 001 was clear.

Enclosed with this letter is the Ohio EPA operation and maintenance document, "Guide for Owners of Package Extended Aeration Sewage Treatment Plants." You may find the information in this document useful in the operation and maintenance of PET Processor's extended aeration plant.

Compliance History

A review of your Discharge Monitoring Reports (DMRs) for the period of April 2006 through August 2010 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00550	Oil and Grease, Total	30D Conc	15	17.5	7/1/2006
001	00550	Oil and Grease, Total	30D Conc	15	17.5	8/1/2006
001	00550	Oil and Grease, Total	30D Conc	15	18.5	10/1/2006
001	00550	Oil and Grease, Total	30D Conc	15	34.	11/1/2006
001	00550	Oil and Grease, Total	1D Conc	20	34.	11/7/2006
001	00550	Oil and Grease, Total	30D Conc	15	21.	12/1/2006
001	00550	Oil and Grease, Total	1D Conc	20	23.	12/19/2006
001	00550	Oil and Grease, Total	30D Conc	15	30.	2/1/2007
001	00550	Oil and Grease, Total	1D Conc	20	40.	2/6/2007
001	00550	Oil and Grease, Total	30D Conc	15	25.5	3/1/2007
001	00550	Oil and Grease, Total	1D Conc	20	23.	3/6/2007

001	00550	Oil and Grease, Total	1D Conc	20	28.	3/21/2007
001	50060	Chlorine, Total Residual	1D Conc	0.038	.1	7/17/2007
001	00550	Oil and Grease, Total	30D Conc	15	50.5	9/1/2007
001	00550	Oil and Grease, Total	1D Conc	20	53.	9/4/2007
001	00550	Oil and Grease, Total	1D Conc	20	48.	9/18/2007
001	00550	Oil and Grease, Total	30D Conc	15	2100.	2/1/2008
001	00550	Oil and Grease, Total	1D Conc	20	4200.	2/25/2008
001	00550	Oil and Grease, Total	30D Conc	15	72.	4/1/2008
001	00550	Oil and Grease, Total	1D Conc	20	132.	4/15/2008
001	50060	Chlorine, Total Residual	1D Conc	0.038	.17	5/20/2008
601	00530	Total Suspended Solids	30D Qty	0.17	.18822	6/1/2006
601	31616	Fecal Coliform	30D Conc	200	330.	8/1/2006
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.94	10/1/2006
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.01	.02893	10/1/2006
601	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	2.94	10/19/2006
601	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.02	.02893	10/19/2006
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	7.14	5/1/2007
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.01	.08513	5/1/2007
601	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	7.14	5/28/2007
601	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.02	.08513	5/28/2007
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	12.6	10/1/2007
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.01	.08012	10/1/2007
601	31616	Fecal Coliform	30D Conc	200	540.	10/1/2007
601	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	12.6	10/9/2007
601	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.02	.08012	10/9/2007
601	31616	Fecal Coliform	1D Conc	400	540.	10/9/2007
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	9.94	1/1/2008
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.04	.06987	1/1/2008
601	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	9.94	1/22/2008
601	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.06	.06987	1/22/2008
601	31616	Fecal Coliform	30D Conc	200	288.	6/1/2009
601	31616	Fecal Coliform	30D Conc	200	660.	7/1/2009
601	31616	Fecal Coliform	1D Conc	400	660.	7/7/2009
601	31616	Fecal Coliform	30D Conc	200	800.	9/1/2009
601	31616	Fecal Coliform	1D Conc	400	800.	9/22/2009
604	00530	Total Suspended Solids	30D Conc	30	91.	6/1/2006
604	00530	Total Suspended Solids	30D Qty	0.10	.30999	6/1/2006
604	00530	Total Suspended Solids	1D Conc	45	91.	6/8/2006
604	00530	Total Suspended Solids	1D Qty	0.15	.30999	6/8/2006
604	00530	Total Suspended Solids	30D Conc	30	228.	7/1/2006
604	00530	Total Suspended Solids	30D Qty	0.10	.77668	7/1/2006
604	00530	Total Suspended Solids	1D Conc	45	228.	7/12/2006
604	00530	Total Suspended Solids	1D Qty	0.15	.77668	7/12/2006
604	00530	Total Suspended Solids	30D Conc	30	128.	8/1/2006
604	00530	Total Suspended Solids	30D Qty	0.10	.43603	8/1/2006
604	00530	Total Suspended Solids	1D Conc	45	128.	8/2/2006
604	00530	Total Suspended Solids	1D Qty	0.15	.43603	8/2/2006

604	00530	Total Suspended Solids	30D Conc	30	248.	9/1/2006
604	00530	Total Suspended Solids	30D Qty	0.10	.84481	9/1/2006
604	00530	Total Suspended Solids	1D Conc	45	248.	9/5/2006
604	00530	Total Suspended Solids	1D Qty	0.15	.84481	9/5/2006
604	00530	Total Suspended Solids	30D Conc	30	720.	11/1/2006
604	00530	Total Suspended Solids	1D Conc	45	720.	11/9/2006
604	00530	Total Suspended Solids	30D Conc	30	1630.	12/1/2006
604	00530	Total Suspended Solids	1D Conc	45	1630.	12/5/2006
604	00530	Total Suspended Solids	30D Conc	30	536.	1/1/2007
604	00530	Total Suspended Solids	1D Conc	45	536.	1/16/2007
604	00530	Total Suspended Solids	30D Conc	30	31.	2/1/2007
604	00530	Total Suspended Solids	30D Conc	30	84.	3/1/2007
604	00530	Total Suspended Solids	1D Conc	45	84.	3/6/2007
604	00530	Total Suspended Solids	30D Conc	30	130.	4/1/2007
604	00530	Total Suspended Solids	1D Conc	45	130.	4/3/2007
604	00530	Total Suspended Solids	30D Conc	30	642.	5/1/2007
604	00530	Total Suspended Solids	1D Conc	45	642.	5/2/2007
604	00530	Total Suspended Solids	30D Conc	30	512.	7/1/2007
604	00530	Total Suspended Solids	1D Conc	45	512.	7/3/2007
604	00530	Total Suspended Solids	30D Conc	30	62.	8/1/2007
604	00530	Total Suspended Solids	1D Conc	45	62.	8/21/2007
604	00530	Total Suspended Solids	30D Conc	30	145.	9/1/2007
604	00530	Total Suspended Solids	30D Qty	0.10	.49394	9/1/2007
604	00530	Total Suspended Solids	1D Conc	45	145.	9/4/2007
604	00530	Total Suspended Solids	1D Qty	0.15	.49394	9/4/2007
604	00530	Total Suspended Solids	30D Conc	30	110.	1/1/2008
604	00530	Total Suspended Solids	1D Conc	45	110.	1/4/2008
604	00530	Total Suspended Solids	30D Conc	30	100.	3/1/2008
604	00530	Total Suspended Solids	1D Conc	45	100.	3/13/2008
604	00530	Total Suspended Solids	30D Conc	30	36.	2/1/2009
604	00530	Total Suspended Solids	30D Qty	0.10	.12263	2/1/2009
605	00550	Oil and Grease, Total	30D Conc	2.5	6.	4/1/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	5/1/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	10.	6/1/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	10.	7/1/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	25.	8/1/2006
605	00550	Oil and Grease, Total	1D Conc	10	25.	8/24/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	9/1/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	17.	10/1/2006
605	00550	Oil and Grease, Total	1D Conc	10	17.	10/25/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	36.	11/1/2006
605	00550	Oil and Grease, Total	1D Conc	10	36.	11/9/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	14.	12/1/2006
605	00550	Oil and Grease, Total	[illegible]onc	10	14.	12/5/2006
605	00550	Oil and Grease, Total	30D Conc	2.5	10.	1/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	52.	2/1/2007
605	00550	Oil and Grease, Total	1D Conc	10	52.	2/6/2007

605	00550	Oil and Grease, Total	30D Conc	2.5	23.	3/1/2007
605	00550	Oil and Grease, Total	1D Conc	10	23.	3/21/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	6.	4/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	9.	5/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	8.	6/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	7/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	41.	9/1/2007
605	00550	Oil and Grease, Total	1D Conc	10	41.	9/18/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	6.	10/1/2007
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	4/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	5/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	6/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	7/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	8/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	9/1/2008
605	00550	Oil and Grease, Total	30D Conc	2.5	6.	3/1/2009
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	6/1/2009
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	11/1/2009
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	2/1/2010
605	00550	Oil and Grease, Total	30D Conc	2.5	7.	6/1/2010

The following frequency violations were noted for the same period:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	00083	Color, Severity	1/Day	1	0	02/02/2007
601	01330	Odor, Severity	1/Day	1	0	02/02/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/02/2007
601	00083	Color, Severity	1/Day	1	0	02/03/2007
601	01330	Odor, Severity	1/Day	1	0	02/03/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/03/2007
601	00083	Color, Severity	1/Day	1	0	02/04/2007
601	01330	Odor, Severity	1/Day	1	0	02/04/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/04/2007
601	00083	Color, Severity	1/Day	1	0	02/05/2007
601	01330	Odor, Severity	1/Day	1	0	02/05/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/05/2007
601	00083	Color, Severity	1/Day	1	0	02/06/2007
601	01330	Odor, Severity	1/Day	1	0	02/06/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/06/2007
601	00083	Color, Severity	1/Day	1	0	02/07/2007
601	01330	Odor, Severity	1/Day	1	0	02/07/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/07/2007
601	00083	Color, Severity	1/Day	1	0	02/08/2007
601	01330	Odor, Severity	1/Day	1	0	02/08/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/08/2007
601	00083	Color, Severity	1/Day	1	0	02/09/2007

601	01330	Odor, Severity	1/Day	1	0	02/09/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/09/2007
601	00083	Color, Severity	1/Day	1	0	02/10/2007
601	01330	Odor, Severity	1/Day	1	0	02/10/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/10/2007
601	00083	Color, Severity	1/Day	1	0	02/11/2007
601	01330	Odor, Severity	1/Day	1	0	02/11/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/11/2007
601	00083	Color, Severity	1/Day	1	0	02/12/2007
601	01330	Odor, Severity	1/Day	1	0	02/12/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/12/2007
601	00083	Color, Severity	1/Day	1	0	02/13/2007
601	01330	Odor, Severity	1/Day	1	0	02/13/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/13/2007
601	00083	Color, Severity	1/Day	1	0	02/14/2007
601	01330	Odor, Severity	1/Day	1	0	02/14/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/14/2007
601	00083	Color, Severity	1/Day	1	0	02/15/2007
601	01330	Odor, Severity	1/Day	1	0	02/15/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/15/2007
601	00083	Color, Severity	1/Day	1	0	02/16/2007
601	01330	Odor, Severity	1/Day	1	0	02/16/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/16/2007
601	00083	Color, Severity	1/Day	1	0	02/17/2007
601	01330	Odor, Severity	1/Day	1	0	02/17/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/17/2007
601	00083	Color, Severity	1/Day	1	0	02/18/2007
601	01330	Odor, Severity	1/Day	1	0	02/18/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/18/2007
601	00083	Color, Severity	1/Day	1	0	02/19/2007
601	01330	Odor, Severity	1/Day	1	0	02/19/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/19/2007
601	00083	Color, Severity	1/Day	1	0	02/20/2007
601	01330	Odor, Severity	1/Day	1	0	02/20/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/20/2007
601	00083	Color, Severity	1/Day	1	0	02/22/2007
601	01330	Odor, Severity	1/Day	1	0	02/22/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/22/2007
601	00083	Color, Severity	1/Day	1	0	02/24/2007
601	01330	Odor, Severity	1/Day	1	0	02/24/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/24/2007
601	00083	Color, Severity	1/Day	1	0	02/25/2007
601	01330	Odor, Severity	1/Day	1	0	02/25/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/25/2007
601	00083	Color, Severity	1/Day	1	0	02/26/2007
601	01330	Odor, Severity	1/Day	1	0	02/26/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/26/2007

601	00083	Color, Severity	1/Day	1	0	02/27/2007
601	01330	Odor, Severity	1/Day	1	0	02/27/2007
601	01350	Turbidity, Severity	1/Day	1	0	02/27/2007
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	03/01/2007
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	03/15/2007
001	50050	Flow Rate	1/Week	1	0	05/22/2007
603	50050	Flow Rate	1/Week	1	0	05/22/2007
001	00550	Oil and Grease, Total	1/2Weeks	1	0	07/15/2008

As a reminder, Part III, Section 12 of your NPDES permit requires you to report, noncompliance that is the result of any violation of a daily maximum discharge limit. You may report noncompliance to the Northeast District Office e-mail account nedo24hournpdes@epa.state.oh.us. A noncompliance report shall be attached to the e-mail. A noncompliance report form is available on the following web site: http://www.epa.ohio.gov/dsw/permits/permits.aspx.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

Part IV of your NPDES permit requires the development and implementation of a Storm Water Pollution Prevention Plan. During the inspection, this writer received a copy of the Storm Water Pollution Prevention Plan. As stated in Part IV, B of the NPDES permit, the Storm Water Pollution Prevention Plan must be signed by a responsible corporate officer. The plan must be implemented and kept up to date. The Storm Water Pollution Prevention Plan states that PET Processors conducts annual training for those people whose job functions have the ability to impact storm water. A sign-in sheet with the names of those individuals receiving the training must maintained among your records and made available when requested by this agency. This writer encourages you to review the storm water requirements of the NPDES permit (Parts IV, V and VI) to ensure that all requirements are met.

Your NPDES permit expires August 31, 2011. An NPDES renewal application must be submitted this office 180 days prior to the expiration date.

Should you have any questions concerning this letter, feel free to contact this writer at (330) 963-1183.

Sincerely,

Marie Underwood

Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU:bo