Environmental Protection Agency

Governor
Lt. Governor
Director

November 24, 2009

RE: TRUMBULL COUNTY
MESOPOTAMIA
DOUBLE B ASSEMBLY
(FORMERLY NESCOR PLASTICS)
4300 KINSMAN RD.
NPDES PERMIT NO. 3IN00300

Mr. Edmund Collens
Double B Assembly
4300 Kinsman Road
Mesopotamia, Ohio 44439

COPY

Dear Mr. Collens:

On October 14, 2009, a meeting was held at the Double B Assembly business, located at 4300 Kinsman Road, Mesopotamia, Trumbull County. The building was formerly owned and occupied by Nescor Plastics Corporation.

Present during the inspection were Mr. Nelson Shively, new owner of the building and general partner in Shively Land Company LLC; you, acting as Mr. Shively's Environmental Management Representative; and this writer, of the Ohio EPA.

The purpose of the inspection was threefold:

1) Discuss the current ownership situation, and business being conducted by Double B Assembly in the former Nescor Plastics facility.
2) Discuss the NPDES Permit ownership transfer, and the associated responsibilities to the intent of the NPDES Permit requirements.
3) Evaluate the operation and maintenance of the existing WWTP; evaluate the effluent discharge quality; and discuss the facility's compliance with NPDES Permit effluent limits, terms, and conditions.

The last CEI conducted at Nescor Plastics was on December 12, 2007.

During the October 14th inspection, the following items were discussed:

1) The former owner of the building, Nescor Plastics Corporation, ceased operation in approximately February 2009.
2) Nescor did not file any Monthly Operating Reports beginning approximately June 2008. Nescor did not notify the Ohio EPA of their cessation of operations.
3) The property was purchased by Shively Land Company LLC in approximately July 2009. Mr. Nelson Shively is the Manager / General Partner of the Shively Land Company.
4) An application for the transfer of the NPDES Permit, from Nescor Plastics to Shively Land Company, was submitted to the Ohio EPA on October 7, 2009.
5) The existing NPDES Permit, currently in Nescor Plastics name, will expire on February 28, 2010. An application for permit renewal has not been submitted to the Ohio EPA to start the renewal process. Upon transfer of the current NPDES Permit ownership, the new owner will submit an NPDES Permit renewal application (application form enclosed).

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6) All production equipment used by Nescor Plastics has been removed from use and sold.
7) Shively Land Company has leased the building to a company doing business as Double B Assembly. Double B Assembly manufactures Amish Heat Surge electric fireplace mantles/enclosures.
8) The assembly of the fireplace mantles/enclosures is a dry assembly process, and no wastewater is generated as a result of the manufacturing process. Pieces are received pre cut, and are nailed and glued together.
9) There are approximately 42 persons employed at Double B Assembly, working 5 days per week, 8 hours per day. During peak season (November-December) there may be as many as 90 persons employed in the business. There are no shower facilities available.
10) The WWTP serving the building is currently in operation, and Mr. Brad Baker is the licensed operator in charge of the WWTP.
11) The facility utilizes an artesian well as its water source. It was indicated that lime is periodically added to the WWTP to adjust pH of the aeration system, and improve operation.
12) The WWTP used to receive cooling tower blowdown water, but use of the cooling tower has ceased. Approximately 1 gallon of air compressor condensate is collected every 3 days, and is disposed of in the WWTP.
13) Samples collected for wastewater analysis are analyzed by Belmont Labs of Dayton, Ohio. Geauga Labs, of Geauga, Ohio, perform the fecal coliform and chlorine residual analysis.

At the time of the inspection, all of the sewage treatment components at the WWTP were in operation and were operating satisfactorily. The following observations were made during the October 14th inspection:

1) Influent enters the WWTP through a 1000 gallon trash trap. Contents of the trash trap were typical, and it was not in need of pumping.

2) Following the trash trap is a 2000 gallon flow equalization tank, which was in use and being aerated. The flow equalization tank contains duplex pumps.

3) Biological treatment is provided by a 5000 gallon aeration plant. The plant was being well aerated, and contents of the tank were a watery medium brown. Suspended solids in the tank appeared to almost be in the organically underloaded operating range.

4) Contents of the settling tank were typical, and the return activated sludge (RAS) line from the settling tank to the aeration tank was operating. Return sludge was a light brown color, and the RAS line is run continuously.

5) The settling tank effluent trough was free of solids, and the skimmer is on a timer and is operated approximately 3X/day.

6) The sand filter dosing station contains 2 submersible pumps, which were in 'Auto' mode. Both pumps, as well as the high level alarm, operated when tested manually.

7) The 450 ft^2 surface sand filters were being utilized, and sand in the filters was raked level and was free of vegetation or solids.

8) Treated effluent is disinfected with tablet chlorine, and is then dechlorinated with tablets.

9) Effluent from the WWTP is discharged to a 20,000 ft^2 pond on the property. The pond eventually discharges to an unnamed tributary of Swine Creek.

10) There are two NPDES Permitted sampling stations for the WWTP: Station 001 is the effluent from the pond as it discharges to the unnamed tributary of Swine Creek; Station 601 is the treated wastewater from the WWTP, prior to discharge to the pond.

A review of the electronic Discharge Monitoring Reports (eDMR) Nescor Plastics submitted for the WWTP (since our last inspection in December 2007), found the following final effluent limit numeric violations:

NESCOR PLASTICS
NPDES PERMIT NO. (3IN00300)
NUMERICAL EFFLUENTY VIOLATIONS
(DEC. 1, 2007 – NOV. 1, 2009)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2008	602	Total Suspended Solids	30D Conc	12	16.	6/1/2008

A review of the eDMRs for the same period also found the following effluent monitoring frequency violations:

NESCOR PLASTICS
NPDES PERMIT NO. (3IN00300)
REPORTING FREQUENCY VIOLATIONS
(DEC. 1, 2007 – NOV. 1, 2009)

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2007	001	pH	1/Week	1	0	12/01/2007
December 2007	602	Total Suspended Solids	1/Quarter	1	0	12/01/2007
December 2007	602	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	12/01/2007
December 2007	602	CBOD 5 day	1/Quarter	1	0	12/01/2007
December 2007	602	Flow Rate	1/Day	1	0	12/01/2007
December 2007	602	Dissolved Oxygen	1/Quarter	1	0	12/01/2007
December 2007	602	Flow Rate	1/Day	1	0	12/02/2007
December 2007	602	Flow Rate	1/Day	1	0	12/06/2007
December 2007	001	pH	1/Week	1	0	12/08/2007
December 2007	602	Flow Rate	1/Day	1	0	12/08/2007
December 2007	602	Flow Rate	1/Day	1	0	12/09/2007
December 2007	602	Flow Rate	1/Day	1	0	12/10/2007
December 2007	602	Flow Rate	1/Day	1	0	12/13/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2007	001	pH	1/Week	1	0	12/15/2007
December 2007	602	Flow Rate	1/Day	1	0	12/15/2007
December 2007	602	Flow Rate	1/Day	1	0	12/16/2007
December 2007	602	Flow Rate	1/Day	1	0	12/17/2007
December 2007	602	Flow Rate	1/Day	1	0	12/19/2007
December 2007	602	Flow Rate	1/Day	1	0	12/20/2007
December 2007	602	Flow Rate	1/Day	1	0	12/22/2007
December 2007	602	Flow Rate	1/Day	1	0	12/23/2007
December 2007	602	Flow Rate	1/Day	1	0	12/24/2007
December 2007	602	Flow Rate	1/Day	1	0	12/25/2007
December 2007	602	Flow Rate	1/Day	1	0	12/29/2007
December 2007	602	Flow Rate	1/Day	1	0	12/30/2007
December 2007	602	Flow Rate	1/Day	1	0	12/31/2007
January 2008	001	pH	1/Week	1	0	01/01/2008
January 2008	602	Flow Rate	1/Day	1	0	01/01/2008
January 2008	602	Flow Rate	1/Day	1	0	01/04/2008
January 2008	602	Flow Rate	1/Day	1	0	01/05/2008
January 2008	602	Flow Rate	1/Day	1	0	01/06/2008
January 2008	001	pH	1/Week	1	0	01/08/2008
January 2008	602	Flow Rate	1/Day	1	0	01/09/2008
January 2008	602	Flow Rate	1/Day	1	0	01/10/2008
January 2008	602	Flow Rate	1/Day	1	0	01/12/2008
January 2008	602	Flow Rate	1/Day	1	0	01/13/2008
January 2008	602	Flow Rate	1/Day	1	0	01/14/2008
January 2008	001	pH	1/Week	1	0	01/15/2008
January 2008	602	Flow Rate	1/Day	1	0	01/16/2008
January 2008	602	Flow Rate	1/Day	1	0	01/17/2008
January 2008	602	Flow Rate	1/Day	1	0	01/19/2008
January 2008	602	Flow Rate	1/Day	1	0	01/20/2008
January 2008	602	Flow Rate	1/Day	1	0	01/21/2008
January 2008	001	pH	1/Week	1	0	01/22/2008
January 2008	602	Flow Rate	1/Day	1	0	01/22/2008
January 2008	602	Flow Rate	1/Day	1	0	01/24/2008
January 2008	602	Flow Rate	1/Day	1	0	01/26/2008
January 2008	602	Flow Rate	1/Day	1	0	01/27/2008
January 2008	602	Flow Rate	1/Day	1	0	01/28/2008
January 2008	602	Flow Rate	1/Day	1	0	01/31/2008
February 2008	001	pH	1/Week	1	0	02/01/2008
February 2008	602	Flow Rate	1/Day	1	0	02/01/2008
February 2008	602	Flow Rate	1/Day	1	0	02/02/2008
February 2008	602	Flow Rate	1/Day	1	0	02/03/2008
February 2008	602	Flow Rate	1/Day	1	0	02/06/2008
February 2008	001	pH	1/Week	1	0	02/08/2008
February 2008	602	Flow Rate	1/Day	1	0	02/08/2008
February 2008	602	Flow Rate	1/Day	1	0	02/09/2008
February 2008	602	Flow Rate	1/Day	1	0	02/10/2008

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2008	602	Flow Rate	1/Day	1	0	02/11/2008
February 2008	001	pH	1/Week	1	0	02/15/2008
February 2008	602	Flow Rate	1/Day	1	0	02/16/2008
February 2008	602	Flow Rate	1/Day	1	0	02/17/2008
February 2008	001	pH	1/Week	1	0	02/22/2008
February 2008	001	Flow Rate	1/Week	1	0	02/22/2008
February 2008	602	Flow Rate	1/Day	1	0	02/22/2008
February 2008	602	Flow Rate	1/Day	1	0	02/23/2008
February 2008	602	Flow Rate	1/Day	1	0	02/24/2008
March 2008	602	Total Suspended Solids	1/Quarter	1	0	03/01/2008
March 2008	602	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	03/01/2008
March 2008	602	CBOD 5 day	1/Quarter	1	0	03/01/2008
March 2008	602	Flow Rate	1/Day	1	0	03/01/2008
March 2008	602	Dissolved Oxygen	1/Quarter	1	0	03/01/2008
March 2008	602	Flow Rate	1/Day	1	0	03/02/2008
March 2008	602	Flow Rate	1/Day	1	0	03/07/2008
March 2008	602	Flow Rate	1/Day	1	0	03/08/2008
March 2008	602	Flow Rate	1/Day	1	0	03/09/2008
March 2008	602	Flow Rate	1/Day	1	0	03/15/2008
March 2008	602	Flow Rate	1/Day	1	0	03/16/2008
March 2008	602	Flow Rate	1/Day	1	0	03/21/2008
March 2008	602	Flow Rate	1/Day	1	0	03/22/2008
March 2008	602	Flow Rate	1/Day	1	0	03/23/2008
March 2008	602	Flow Rate	1/Day	1	0	03/29/2008
March 2008	602	Flow Rate	1/Day	1	0	03/30/2008
April 2008	602	Flow Rate	1/Day	1	0	04/05/2008
April 2008	602	Flow Rate	1/Day	1	0	04/06/2008
April 2008	001	pH	1/Week	1	0	04/08/2008
April 2008	602	Flow Rate	1/Day	1	0	04/12/2008
April 2008	602	Flow Rate	1/Day	1	0	04/13/2008
April 2008	001	pH	1/Week	1	0	04/15/2008
April 2008	602	Flow Rate	1/Day	1	0	04/19/2008
April 2008	602	Flow Rate	1/Day	1	0	04/20/2008
April 2008	001	pH	1/Week	1	0	04/22/2008
April 2008	602	Flow Rate	1/Day	1	0	04/26/2008
April 2008	602	Flow Rate	1/Day	1	0	04/27/2008
May 2008	602	Flow Rate	1/Day	1	0	05/03/2008
May 2008	602	Flow Rate	1/Day	1	0	05/04/2008
May 2008	602	Flow Rate	1/Day	1	0	05/10/2008
May 2008	602	Flow Rate	1/Day	1	0	05/11/2008
May 2008	602	Flow Rate	1/Day	1	0	05/16/2008
May 2008	602	Flow Rate	1/Day	1	0	05/17/2008
May 2008	602	Flow Rate	1/Day	1	0	05/18/2008
May 2008	602	Flow Rate	1/Day	1	0	05/24/2008
May 2008	602	Flow Rate	1/Day	1	0	05/25/2008
May 2008	602	Flow Rate	1/Day	1	0	05/26/2008

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2008	602	Flow Rate	1/Day	1	0	05/31/2008
June 2008	602	Chlorine, Total Residual	1/Quarter	1	0	06/01/2008
June 2008	602	Flow Rate	1/Day	1	0	06/01/2008
June 2008	602	Dissolved Oxygen	1/Quarter	1	0	06/01/2008
June 2008	602	Flow Rate	1/Day	1	0	06/07/2008
June 2008	602	Flow Rate	1/Day	1	0	06/08/2008
June 2008	602	Flow Rate	1/Day	1	0	06/14/2008
June 2008	602	Flow Rate	1/Day	1	0	06/15/2008
June 2008	602	Flow Rate	1/Day	1	0	06/21/2008
June 2008	602	Flow Rate	1/Day	1	0	06/22/2008
June 2008	602	Flow Rate	1/Day	1	0	06/28/2008
June 2008	602	Flow Rate	1/Day	1	0	06/29/2008
July 2008	602	Flow Rate	1/Day	1	0	07/04/2008
July 2008	602	Flow Rate	1/Day	1	0	07/05/2008
July 2008	602	Flow Rate	1/Day	1	0	07/06/2008
July 2008	602	Flow Rate	1/Day	1	0	07/12/2008
July 2008	602	Flow Rate	1/Day	1	0	07/13/2008
July 2008	602	Flow Rate	1/Day	1	0	07/19/2008
July 2008	602	Flow Rate	1/Day	1	0	07/20/2008
July 2008	602	Flow Rate	1/Day	1	0	07/26/2008
July 2008	602	Flow Rate	1/Day	1	0	07/27/2008
August 2008	602	Total Suspended Solids	1/Quarter	1	0	08/01/2008
August 2008	602	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	08/01/2008
August 2008	602	Fecal Coliform	1/Quarter	1	0	08/01/2008
August 2008	602	CBOD 5 day	1/Quarter	1	0	08/01/2008
August 2008	602	Chlorine, Total Residual	1/Quarter	1	0	08/01/2008
August 2008	602	Dissolved Oxygen	1/Quarter	1	0	08/01/2008
August 2008	602	Flow Rate	1/Day	1	0	08/02/2008
August 2008	602	Flow Rate	1/Day	1	0	08/03/2008
August 2008	602	Flow Rate	1/Day	1	0	08/09/2008
August 2008	602	Flow Rate	1/Day	1	0	08/10/2008
August 2008	602	Flow Rate	1/Day	1	0	08/16/2008
August 2008	602	Flow Rate	1/Day	1	0	08/17/2008
August 2008	602	Flow Rate	1/Day	1	0	08/23/2008
August 2008	602	Flow Rate	1/Day	1	0	08/24/2008
August 2008	602	Flow Rate	1/Day	1	0	08/30/2008
August 2008	602	Flow Rate	1/Day	1	0	08/31/2008
December 2008	602	Total Suspended Solids	1/Quarter	1	0	12/01/2008
December 2008	602	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	12/01/2008
December 2008	602	CBOD 5 day	1/Quarter	1	0	12/01/2008
December 2008	602	Dissolved Oxygen	1/Quarter	1	0	12/01/2008
January 2009	602	Color, Severity	1/Week	1	0	01/22/2009
January 2009	602	Odor, Severity	1/Week	1	0	01/22/2009
January 2009	602	Turbidity, Severity	1/Week	1	0	01/22/2009

As was discussed during our meeting, the major focus by Shively Land Company should be on keeping the WWTP properly operating and maintained, and meeting the NPDES Permit limits and conditions. Transfer of ownership of the NPDES Permit will be a priority, as will be the renewal of the permit, since it will expire on February 28, 2010.

The application for renewal of the NPDES Permit was to have been submitted to the Ohio EPA no later than 6 months before the expiration date (by August 31, 2009). However, since the current permit is technically not transferred yet, it is recommended that the application for renewal be prepared by Shively Land Company, but not submitted to the Ohio EPA until the permit ownership transfer notification is received.

If you have any questions or comments about this document, you may contact me at (330) 963-1110.

Respectfully,

Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt