



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

January 22, 2010

RE: PRAXAIR INC.
3IF00040*ED
STARK COUNTY

Ms. Jennifer Goebel
Plant Engineer
Praxair Inc.
2225 Bolivar Rd.
Canton, Ohio 44706

Dear Ms. Goebel:

On January 14, 2010 this writer conducted a compliance evaluation inspection of the above referenced Praxair facility. Praxair produces gaseous and liquid Oxygen, Nitrogen, and Argon by the air separation method. Compressors used in this process are water cooled. The non-contact cooling water is recycled through a cooling tower. Blowdown from the cooling tower is permitted through outfall 3IF00040001. The blowdown is treated with Sodium Bisulfite to remove Chlorine. At the time of the inspection outfall 001 was flowing. No visual problems were noted with the discharge which flows to Hurford Run. A review of your compliance history for the time period of April 2007 through December 2009 revealed the following violations of the NPDES permit:

Numeric Violations

There were none for this reporting period.

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	Chlorine, Total Residu	1/2Weeks	1	0	05/01/2007
001	Oxidants, Total Residu	1/2Weeks	1	0	05/01/2007
001	Chlorine, Total Residu	1/2Weeks	1	0	07/15/2007
001	Oxidants, Total Residu	1/2Weeks	1	0	07/15/2007
001	Chlorine, Total Residu	1/2Weeks	1	0	10/15/2007
001	Oxidants, Total Residu	1/2Weeks	1	0	10/15/2007

You gave me a copy of a No Exposure Certification that had been submitted to this Agency with a cover letter dated April 29, 2005. Please be aware that the Certification must be completed and submitted once every 5 years, and can only be done so if the condition of no exposure continues to exist at your facility. One area that was noted

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during the inspection was the shed which contains the cooling tower treatment chemicals. At the time of the inspection, the floor was wet, the doors open and water was present outside the shed on the concrete. This may be an isolated event, but the same conditions were present during our previous inspection. If this is just water, then there is no problem. If it contains any contaminants, then you cannot claim no exposure until this situation has been permanently eliminated. Also, diking around above ground storage tanks and below grade tanks can also qualify for no exposure. We request that you provide detailed information on these tanks such as the liquid stored, how it is dispensed, stormwater controls present, material transfer procedures, and how collected stormwater is handled and disposed. Please refer to the Guidance Manual from USEPA at the following Web site for more information concerning the Certification:

http://cfpub.epa.gov/npdes/stormwater/exposure.cfm?program_id=6

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E
Environmental Specialist II
Division of Surface Water

PPR/mt

File: Industrial Permit/Compliance

Praxair 1/14/2010. Outfall 001
discharge.

