



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

August 24, 2007

RE: ASHTABULA COUNTY
PREMIX INC.
OHIO EPA PERMIT NO. 3IQ00031
NONSUBMITTAL VIOLATION LETTER

Mr. Walter C. McSherry, Jr.
Environmental Manager
Premix, Inc.
P.O. Box 281
North Kingsville, OH 44068-0281

Dear Mr. McSherry:

On August 13, 2007, a pre-permit inspection was conducted at the above referenced facility by the undersigned. The purpose of the inspection was to evaluate 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 course of the inspection, evaluations were conducted of the facility's treatment processes and effluent discharge quality at the respective outfalls.

At the time of the inspection, the plant was observed to be in good working order. However, there appeared to be scouring occurring in the surface sand filters around the concrete pads where the sanitary effluent discharges to the filters. It is recommended that stone be added to the filters to reduce the scouring.

A review of the monthly operating reports for the period of January 2005 through July 2007 shows the following violations with respect to the facility's limits:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2005	601	pH	1D Conc	6.5	6.32	1/26/2005
February 2005	601	pH	1D Conc	6.5	6.11	2/2/2005
May 2005	601	Dissolved Oxygen	1D Conc	6.0	4.2	5/18/2005
December 2005	601	pH	1D Conc	6.5	6.41	12/30/2005
January 2006	601	pH	1D Conc	6.5	6.35	1/13/2006
January 2006	601	pH	1D Conc	6.5	6.44	1/20/2006
July 2006	601	Total Suspended Solids	7D Conc	18	25.	7/22/2006
August 2006	601	Total Suspended Solids	7D Conc	18	31.	8/1/2006
February 2007	601	pH	1D Conc	6.5	6.4	2/9/2007
February 2007	601	pH	1D Conc	6.5	6.48	2/16/2007
February 2007	601	pH	1D Conc	6.5	6.04	2/23/2007
April 2007	601	pH	1D Conc	6.5	6.31	4/20/2007
July 2007	601	pH	1D Conc	6.5	6.01	7/20/2007

The following frequency violations have occurred during the same timeframe:

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Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
July 2006	7/1/2006	602	Flow Rate	1/Day	1	0
July 2006	7/2/2006	602	Flow Rate	1/Day	1	0
July 2006	7/3/2006	602	Flow Rate	1/Day	1	0
July 2006	7/4/2006	602	Flow Rate	1/Day	1	0
July 2006	7/5/2006	602	Flow Rate	1/Day	1	0
July 2006	7/6/2006	602	Flow Rate	1/Day	1	0
July 2006	7/7/2006	602	Flow Rate	1/Day	1	0
July 2006	7/8/2006	602	Flow Rate	1/Day	1	0
July 2006	7/9/2006	602	Flow Rate	1/Day	1	0
July 2006	7/10/2006	602	Flow Rate	1/Day	1	0
July 2006	7/11/2006	602	Flow Rate	1/Day	1	0
July 2006	7/12/2006	602	Flow Rate	1/Day	1	0
July 2006	7/13/2006	602	Flow Rate	1/Day	1	0
July 2006	7/14/2006	602	Flow Rate	1/Day	1	0
July 2006	7/15/2006	602	Flow Rate	1/Day	1	0
July 2006	7/16/2006	602	Flow Rate	1/Day	1	0
July 2006	7/17/2006	602	Flow Rate	1/Day	1	0
July 2006	7/18/2006	602	Flow Rate	1/Day	1	0
July 2006	7/19/2006	602	Flow Rate	1/Day	1	0
July 2006	7/20/2006	602	Flow Rate	1/Day	1	0
July 2006	7/21/2006	602	Flow Rate	1/Day	1	0
July 2006	7/22/2006	602	Flow Rate	1/Day	1	0
July 2006	7/23/2006	602	Flow Rate	1/Day	1	0
July 2006	7/24/2006	602	Flow Rate	1/Day	1	0
July 2006	7/25/2006	602	Flow Rate	1/Day	1	0
July 2006	7/26/2006	602	Flow Rate	1/Day	1	0
July 2006	7/27/2006	602	Flow Rate	1/Day	1	0
July 2006	7/28/2006	602	Flow Rate	1/Day	1	0
July 2006	7/29/2006	602	Flow Rate	1/Day	1	0
July 2006	7/30/2006	602	Flow Rate	1/Day	1	0
July 2006	7/31/2006	602	Flow Rate	1/Day	1	0
August 2006	8/5/2006	602	Flow Rate	1/Day	1	0
August 2006	8/6/2006	602	Flow Rate	1/Day	1	0
August 2006	8/12/2006	602	Flow Rate	1/Day	1	0
August 2006	8/13/2006	602	Flow Rate	1/Day	1	0
August 2006	8/19/2006	602	Flow Rate	1/Day	1	0
August 2006	8/20/2006	602	Flow Rate	1/Day	1	0
August 2006	8/26/2006	602	Flow Rate	1/Day	1	0
August 2006	8/27/2006	602	Flow Rate	1/Day	1	0
September 2006	9/2/2006	602	Flow Rate	1/Day	1	0
September 2006	9/3/2006	602	Flow Rate	1/Day	1	0
September 2006	9/4/2006	602	Flow Rate	1/Day	1	0
September 2006	9/9/2006	602	Flow Rate	1/Day	1	0
September 2006	9/10/2006	602	Flow Rate	1/Day	1	0
September 2006	9/16/2006	602	Flow Rate	1/Day	1	0

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September 2006	9/17/2006	602	Flow Rate	1/Day	1	0
September 2006	9/23/2006	602	Flow Rate	1/Day	1	0
September 2006	9/24/2006	602	Flow Rate	1/Day	1	0
September 2006	9/30/2006	602	Flow Rate	1/Day	1	0
November 2006	11/4/2006	602	Flow Rate	1/Day	1	0
November 2006	11/5/2006	602	Flow Rate	1/Day	1	0
November 2006	11/11/2006	602	Flow Rate	1/Day	1	0
November 2006	11/12/2006	602	Flow Rate	1/Day	1	0
November 2006	11/18/2006	602	Flow Rate	1/Day	1	0
November 2006	11/19/2006	602	Flow Rate	1/Day	1	0
November 2006	11/23/2006	602	Flow Rate	1/Day	1	0
November 2006	11/24/2006	602	Flow Rate	1/Day	1	0
November 2006	11/25/2006	602	Flow Rate	1/Day	1	0
November 2006	11/26/2006	602	Flow Rate	1/Day	1	0
December 2006	12/2/2006	602	Flow Rate	1/Day	1	0
December 2006	12/3/2006	602	Flow Rate	1/Day	1	0
December 2006	12/9/2006	602	Flow Rate	1/Day	1	0
December 2006	12/10/2006	602	Flow Rate	1/Day	1	0
December 2006	12/16/2006	602	Flow Rate	1/Day	1	0
December 2006	12/17/2006	602	Flow Rate	1/Day	1	0
December 2006	12/23/2006	602	Flow Rate	1/Day	1	0
December 2006	12/24/2006	602	Flow Rate	1/Day	1	0
December 2006	12/25/2006	602	Flow Rate	1/Day	1	0
December 2006	12/26/2006	602	Flow Rate	1/Day	1	0
December 2006	12/27/2006	602	Flow Rate	1/Day	1	0
December 2006	12/28/2006	602	Flow Rate	1/Day	1	0
December 2006	12/29/2006	602	Flow Rate	1/Day	1	0
December 2006	12/30/2006	602	Flow Rate	1/Day	1	0
December 2006	12/31/2006	602	Flow Rate	1/Day	1	0
January 2007	1/1/2007	602	Flow Rate	1/Day	1	0
January 2007	1/6/2007	602	Flow Rate	1/Day	1	0
January 2007	1/7/2007	602	Flow Rate	1/Day	1	0
January 2007	1/13/2007	602	Flow Rate	1/Day	1	0
January 2007	1/14/2007	602	Flow Rate	1/Day	1	0
January 2007	1/20/2007	602	Flow Rate	1/Day	1	0
January 2007	1/21/2007	602	Flow Rate	1/Day	1	0
January 2007	1/27/2007	602	Flow Rate	1/Day	1	0
January 2007	1/28/2007	602	Flow Rate	1/Day	1	0
May 2007	5/1/2007	601	Fecal Coliform	1/Month	1	0
May 2007	5/5/2007	601	Flow Rate	1/Day	1	0
May 2007	5/6/2007	601	Flow Rate	1/Day	1	0
May 2007	5/12/2007	601	Flow Rate	1/Day	1	0
May 2007	5/13/2007	601	Flow Rate	1/Day	1	0
May 2007	5/19/2007	601	Flow Rate	1/Day	1	0
May 2007	5/20/2007	601	Flow Rate	1/Day	1	0
May 2007	5/25/2007	601	Flow Rate	1/Day	1	0
May 2007	5/26/2007	601	Flow Rate	1/Day	1	0
May 2007	5/27/2007	601	Flow Rate	1/Day	1	0

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May 2007	5/28/2007	601	Flow Rate	1/Day	1	0
June 2007	6/2/2007	601	Flow Rate	1/Day	1	0
June 2007	6/3/2007	601	Flow Rate	1/Day	1	0
June 2007	6/9/2007	601	Flow Rate	1/Day	1	0
June 2007	6/10/2007	601	Flow Rate	1/Day	1	0
June 2007	6/16/2007	601	Flow Rate	1/Day	1	0
June 2007	6/17/2007	601	Flow Rate	1/Day	1	0
June 2007	6/23/2007	601	Flow Rate	1/Day	1	0
June 2007	6/24/2007	601	Flow Rate	1/Day	1	0
June 2007	6/30/2007	601	Flow Rate	1/Day	1	0

The cause of the above violations should be conveyed to Ohio EPA along with the actions to be taken to eliminate the violations. This information should be sent along with the items noted below with respect to the permit application.

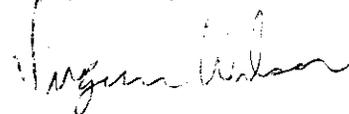
The National Pollutant Discharge Elimination System (NPDES) renewal application was also reviewed. The following information needs to be added to the application prior to renewing the permit:

1. Please obtain a discharge sample after the oil/water separator to be tested for oil and grease to verify that the system is operating properly.
2. Form 2C, Section II A requires the submittal of a line drawing showing the water flow through the facility. This drawing needs to be submitted.

Based on the inspection findings and the overall compliance record of the facility, the facility is considered to be in substantial compliance; therefore, this office anticipates drafting and public-noticing the renewal permit for public review and comment after receiving the above information. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit.

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

Respectfully,



Virginia Wilson, P.E.
Geological Engineer
Division of Surface Water

VW/mt

File: Industrial/Premix Inc./P&C