

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 8, 2010

RE: PREMIX INC. ASHTABULA PLANT
OHIO EPA PERMIT 3IQ00031
KINGSVILLE VILLAGE, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

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

Dear Mr. McSherry:

On June 1, 2010, a site inspection was conducted at the above referenced facility at 3365 East Center Street (U.S. Route 20 at Harmon Road), Village of North Kingsville, Ashtabula County. The inspection was conducted by John Schmidt and Erm Gomes of this office, with you representing Premix Inc. during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on March 17, 2009.

No industrial process waste water is discharged to the waste water treatment systems. Waste water treatment at Premix Inc. is accomplished by two different processes:

Industrial Waste Water Treatment (Oil Water Separator):

Under drains from Manufacturing Areas A, B, and C, representing the eastern half of the manufacturing area, flow to an oil/water separator prior to discharge to a storm water retention pond. Following settling in the retention pond, water flows to a waste water lagoon. The lagoon discharges to the east side ditch along Harmon Road to an unnamed tributary to Lake Erie. The tributary is located along Harmon Road northwest of the plant.

Plant Sanitary Waste Water Treatment:

The plant receives plant sanitary wastes. The system consists of a trash trap, equalization tank, extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The outfall from the WWTP is Outfall 601. Flows from the sanitary WWTP (Outfall 601), the noncontact cooling water (Outfall 602), and storm water from various sources are combined. The combined plant effluent discharges to a waste water lagoon and is sampled as Outfall 001, and discharged to the ditch along Harmon Road for ultimate discharge to an unnamed tributary to Lake Erie northwest of the plant. No backup power is provided to the facility, and the facility is provided with alarms.

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Noncontact Cooling Water:

Noncontact cooling water and roof drains D and E is discharged to the retention pond as Outfall 602 where it combines with Outfall 601 (Sanitary WWTP outfall) and the oil/water separator discharge. The combined plant effluent discharges to a waste water lagoon and is sampled as Outfall 001, and discharged to the ditch along Harmon Road for ultimate discharge to an unnamed tributary to Lake Erie northwest of the plant.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 26,000 gallons per day, and receives between 100 and 5,200 gpd. The plant exhibits symptoms of being under-loaded, with a light brown sludge that is well aerated. The plant was observed in good working order.
2. A log book of repairs and observations is not maintained at the WWTP, but an electronic log book is maintained by Mr. McSherry.
3. Clarifier weirs do not appear to have been scraped in a while.
4. Sludge has not been wasted from the system in 2-3 years.
5. A flow meter was observed as non-operational. Premix indicates that the flow meter has not operated for several years. Flow is estimated from influent pump settings. No discharge was noted from the Sanitary WWTP (Outfall 601).
6. Composite samples are collected as a single grab sample daily, and composited into a weekly sample.
7. No flow from the blow down and storm water discharge was observed during the inspection (Outfall 602).
8. The lagoon water level was observed as several feet below the level of the final discharge (Outfall 001). No discharge was observed from the final lagoon (see pictures) and no flow from the lagoon has been reported on the eDMR reports from March 2009 to May 2010.
9. The final discharge to Fields Brook (Outfall 002) was found to be discharging clear at the inspection manhole.

NPDES Permit Compliance Review

Detrex operates under Permit 31F00017*ND. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2009 through

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May 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00400	pH	1D Conc	6.5	6.33	3/19/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.7	10/8/2009
601	00400	pH	1D Conc	6.5	6.14	8/21/2009
601	00530	Total Suspended Solids	30D Conc	12	14.5	9/1/2009
601	00530	Total Suspended Solids	7D Conc	18	45.	9/15/2009

A written explanation as to why these exceedances occurred must be provided.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

1. Failure to Maintain - Sanitary WWTP [OAC 3745-7-09, Permit Part III, Item 3]: Premix has failed to maintain the flow meter at its Sanitary WWTP. Premix must make immediate repairs to the sanitary effluent flow meter to ensure that continuous flow readings are maintained pursuant to your permit at Outfall 601.
2. Sludge Wasting from System: Sludge wasting from the system should be more frequent than once every 2-3 years. You waste water operator can perform a settle ability test to determine the appropriate rate. Sludge tanks should be no more than 30-50% full.

Comments

Ohio EPA offers the following comments:

1. Clarifier sides and effluent weirs should be cleaned weekly to bi-weekly. Having a squeegee to accomplish this task is helpful. Scum should be moved to be intercepted by the skimmer.
2. The Sanitary WWTP effluent flow meter must be repaired immediately and documentation provided to Ohio EPA that repairs have been made.

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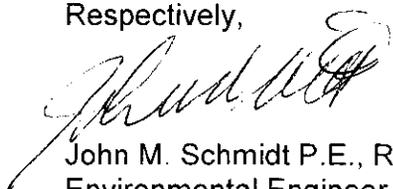
3. Composite samples are specified in Part II – Item K of your permit, and must contain at least three samples taken proportional to the volume of sewage flow rate collected at least 30 minutes apart.
4. In addition to the electronic log of observations made, a log must be maintained of inspection dates and times by your operator of record, including any recommendations for Premix staff to implement. Records of equipment maintenance and inspection must also be included. As discussed with you during the inspection, a checklist is recommended.

Based on the above information, Premix is considered to be in substantial compliance with the terms and conditions of the NPDES permit. However, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

File: Premix Inc./Industrial P/C