



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 16, 2011

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

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

Dear Mr. McSherry:

On June 16, 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 of this office, with you and James Steudler of THD & Associates 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 June 1, 2010.

No industrial process waste water is discharged to the waste water treatment systems other than industrial storm water and non-contact cooling water. Waste water treatment at Premix Inc. is accomplished by two different processes (see attached figure):

Industrial Waste Water Treatment and Storm 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. Storm water from paved areas of the facility also flows to the storm water 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.

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. There have been no changes in industrial processes since the last inspection. A process flow diagram is attached.
2. The design flow of the extended aeration plant is 26,000 gallons per day, although the plant is not receiving anywhere near that flow. The plant is currently receiving between 100 gpd and 5,200 gpd. The plant operates on a timer for three hours in the morning and three hours in the afternoon when the plant receives flow.
3. The plant is operated by Roger Osborne of Lewis Wastewater Services who also operates a variety of other facilities in Ashtabula County as a contract operator.
4. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. The last entry noted is September 2010. Additional inspection logs by Premix staff are maintained in electronic form by Mr. McSherry.
5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash was containerized for disposal at a solid waste landfill.
6. The pumps for the influent pump station were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The content of the aeration tank had a chocolate brown color and good mixing. Sludge returns were also a chocolate brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition. The tank was cleaned in April 2010.
8. The surface of the clarifier was clear. The return sludge lines and skimmer were found in proper operation. The tank was cleaned in April 2010. Effluent channels and weirs were reasonably clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were clean and operable. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.

11. The flow meter was replaced in August 2010.
12. Sludge was removed from the facility in June 2010 and again on April 11, 2011.
13. The UV disinfection system was inspected and found in operating condition.
14. The final effluent was clear as observed in a manhole between the plant and the final outfall. The final discharge at the pond could not be observed as it was partially submerged by the pond/tributary.
15. Samples are collected by Microbac. Microbac performs on-site analysis of pH and DO, while Lewis Wastewater Services and Premix staff perform observations of flow, color, odor, and turbidity.
16. Microbac Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
17. Mr. McSherry submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
18. The oil/water separator for the industrial storm water and associated holding pond were cleaned on May 19, 2011, The pond was observed as nearly empty.
19. No flow from the blow down and storm water discharge was observed during the inspection (Outfall 602).
20. 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.
21. The storm water pollution prevention plan (SWPPP) was updated on November 5, 2010. The annual site certification inspection was completed on September 28, 2010 with a follow up on November 3, 2010. Employee training is conducted throughout the year, with the latest training conducted in December 2010.
22. No evidence of discharges was noted from the roll-off box storage area.

NPDES Permit Compliance Review

Premix, Inc. operates under Permit 3IQ00031*DD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2010 through May 1, 2011 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:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00300	Dissolved Oxygen	1D Conc	6.0	5.3	9/3/2010
601	00400	pH	1D Conc	6.5	6.47	12/3/2010
601	00530	Total Suspended Solids	7D Qty	1.77	3.21876	3/15/2011
601	00400	pH	1D Conc	6.5	6.15	4/29/2011

A written explanation as to why these exceedences occurred, along with measures to ensure that they are not repeated were provided to Ohio EPA via correspondence dated September 9, 2010, March 26, 2011, April 13, 2011, and May 19, 2011. You suspect calibration issues with the pH equipment used by your contract operator and laboratory. Other instances can be attributed to biologic under-loading of the WWTP due to staff reductions. You should ensure that the WWTP log books reflect calibration dates and times, and that the pH is being collected at the WWTP and not sent into the laboratory for analysis. Mr. Osborne should also be documenting his visits to the facility. No additional response is required at this time to address these exceedences.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

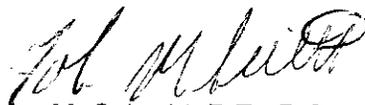
Compliance Schedule Violations

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

Based on the above information, Premix is considered to be in substantial compliance with the terms and conditions of the NPDES permit for its Premix Ashtabula Facility.

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

cc: Roger Osborne, Lewis Wastewater Services

File: Industrial/Premix/pc

