



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

November 19, 2007

RE: ASHTABULA COUNTY
STATE ROAD IND. DEVEL. LLC
OHIO EPA PERMIT NO. 3IE00012

Mr. Ronald McVoy, Reporter
State Road Industrial Development LLC
600 State Road
Ashtabula, OH 44004

Dear Mr. McVoy:

On October 19, 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 National Pollutant Discharge Elimination System (NPDES) permit. In addition, information gathered during the inspection will be utilized in determining the renewal status of the NPDES permit.

The on-site inspection determined that the treatment system was not operating at peak performance. The waste in the aeration tank was black in color. However, all components appeared to be functioning properly. In addition, a review of the monthly monitoring reports showed the following violations:

Limit Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2006	001	Dissolved Oxygen	1D Conc	6.0	.9	3/13/2006
June 2007	001	Dissolved Oxygen	1D Conc	6.0	2.2	6/28/2007
August 2007	001	Dissolved Oxygen	1D Conc	6.0	1.	8/13/2007
March 2006	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.4	3/1/2006
March 2006	001	Nitrogen, Ammonia (NH3	30D Qty	0.011	.02044	3/1/2006
March 2006	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.4	3/13/2006
March 2006	001	Nitrogen, Ammonia (NH3	1D Qty	0.017	.02044	3/13/2006
June 2007	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	18.9	6/1/2007
June 2007	001	Nitrogen, Ammonia (NH3	30D Qty	0.004	.07154	6/1/2007
June 2007	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	18.9	6/28/2007
June 2007	001	Nitrogen, Ammonia (NH3	1D Qty	0.006	.07154	6/28/2007
August 2007	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	17.8	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	30D Qty	0.004	.06737	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	17.8	8/13/2007
August 2007	001	Nitrogen, Ammonia (NH3	1D Qty	0.006	.06737	8/13/2007
August 2003	001	Total Suspended Solids	7D Conc	30	246.	8/22/2003
August 2003	001	Total Suspended Solids	1D Conc	45	246.	8/26/2003
June 2007	001	Total Suspended Solids	30D Conc	12	64.	6/1/2007

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2007	001	Total Suspended Solids	30D Qty	0.045	.24224	6/1/2007
June 2007	001	Total Suspended Solids	1D Conc	18	64.	6/28/2007
June 2007	001	Total Suspended Solids	1D Qty	0.068	.24224	6/28/2007
August 2007	001	Total Suspended Solids	30D Conc	12	234.	8/1/2007
August 2007	001	Total Suspended Solids	30D Qty	0.045	.88569	8/1/2007
August 2007	001	Total Suspended Solids	1D Conc	18	234.	8/13/2007
August 2007	001	Total Suspended Solids	1D Qty	0.068	.88569	8/13/2007

Code Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2007	001	Fecal Coliform			AK	8/13/2007

Frequency Violations

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
August 2003	8/1/2003	001	CBOD 5 day	1/Quarter	1	0
August 2003	8/1/2003	001	Color, Severity	1/Week	1	0
August 2003	8/1/2003	001	Odor, Severity	1/Week	1	0
August 2003	8/1/2003	001	pH	1/Quarter	1	0
August 2003	8/1/2003	001	Turbidity, Severity	1/Week	1	0
August 2003	8/1/2003	001	Water Temperature	1/Week	1	0
August 2003	8/8/2003	001	Color, Severity	1/Week	1	0
August 2003	8/8/2003	001	Odor, Severity	1/Week	1	0
August 2003	8/8/2003	001	Turbidity, Severity	1/Week	1	0
August 2003	8/8/2003	001	Water Temperature	1/Week	1	0
August 2003	8/15/2003	001	Color, Severity	1/Week	1	0
August 2003	8/15/2003	001	Odor, Severity	1/Week	1	0
August 2003	8/15/2003	001	Turbidity, Severity	1/Week	1	0
August 2003	8/15/2003	001	Water Temperature	1/Week	1	0
August 2003	8/22/2003	001	Water Temperature	1/Week	1	0
March 2006	3/1/2006	001	Color, Severity	1/Week	1	0
March 2006	3/1/2006	001	Odor, Severity	1/Week	1	0
March 2006	3/1/2006	001	pH	1/Quarter	1	0
March 2006	3/1/2006	001	Turbidity, Severity	1/Week	1	0
March 2006	3/1/2006	001	Water Temperature	1/Week	1	0
March 2006	3/8/2006	001	Water Temperature	1/Week	1	0
March 2006	3/15/2006	001	Color, Severity	1/Week	1	0
March 2006	3/15/2006	001	Odor, Severity	1/Week	1	0
March 2006	3/15/2006	001	Turbidity, Severity	1/Week	1	0
March 2006	3/15/2006	001	Water Temperature	1/Week	1	0
March 2006	3/22/2006	001	Color, Severity	1/Week	1	0

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Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
March 2006	3/22/2006	001	Odor, Severity	1/Week	1	0
March 2006	3/22/2006	001	Turbidity, Severity	1/Week	1	0
March 2006	3/22/2006	001	Water Temperature	1/Week	1	0
June 2007	6/1/2007	001	Color, Severity	1/Week	1	0
June 2007	6/1/2007	001	Odor, Severity	1/Week	1	0
June 2007	6/1/2007	001	pH	1/Quarter	1	0
June 2007	6/1/2007	001	Turbidity, Severity	1/Week	1	0
June 2007	6/1/2007	001	Water Temperature	1/Week	1	0
June 2007	6/8/2007	001	Color, Severity	1/Week	1	0
June 2007	6/8/2007	001	Odor, Severity	1/Week	1	0
June 2007	6/8/2007	001	Turbidity, Severity	1/Week	1	0
June 2007	6/8/2007	001	Water Temperature	1/Week	1	0
June 2007	6/15/2007	001	Color, Severity	1/Week	1	0
June 2007	6/15/2007	001	Odor, Severity	1/Week	1	0
June 2007	6/15/2007	001	Turbidity, Severity	1/Week	1	0
June 2007	6/15/2007	001	Water Temperature	1/Week	1	0
June 2007	6/22/2007	001	Water Temperature	1/Week	1	0
July 2007	7/1/2007	001	Color, Severity	1/Week	1	0
July 2007	7/1/2007	001	Odor, Severity	1/Week	1	0
July 2007	7/1/2007	001	Turbidity, Severity	1/Week	1	0
July 2007	7/1/2007	001	Water Temperature	1/Week	1	0
July 2007	7/8/2007	001	Color, Severity	1/Week	1	0
July 2007	7/8/2007	001	Odor, Severity	1/Week	1	0
July 2007	7/8/2007	001	Turbidity, Severity	1/Week	1	0
July 2007	7/8/2007	001	Water Temperature	1/Week	1	0
July 2007	7/15/2007	001	Color, Severity	1/Week	1	0
July 2007	7/15/2007	001	Odor, Severity	1/Week	1	0
July 2007	7/15/2007	001	Turbidity, Severity	1/Week	1	0
July 2007	7/15/2007	001	Water Temperature	1/Week	1	0
July 2007	7/22/2007	001	Water Temperature	1/Week	1	0
August 2007	8/1/2007	001	Color, Severity	1/Week	1	0
August 2007	8/1/2007	001	Odor, Severity	1/Week	1	0
August 2007	8/1/2007	001	pH	1/Quarter	1	0
August 2007	8/1/2007	001	Turbidity, Severity	1/Week	1	0
August 2007	8/1/2007	001	Water Temperature	1/Week	1	0
August 2007	8/8/2007	001	Water Temperature	1/Week	1	0
August 2007	8/15/2007	001	Color, Severity	1/Week	1	0
August 2007	8/15/2007	001	Odor, Severity	1/Week	1	0
August 2007	8/15/2007	001	Turbidity, Severity	1/Week	1	0
August 2007	8/15/2007	001	Water Temperature	1/Week	1	0
August 2007	8/22/2007	001	Color, Severity	1/Week	1	0
August 2007	8/22/2007	001	Odor, Severity	1/Week	1	0
August 2007	8/22/2007	001	Turbidity, Severity	1/Week	1	0
August 2007	8/22/2007	001	Water Temperature	1/Week	1	0
September 2007	9/1/2007	001	Color, Severity	1/Week	1	0

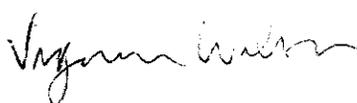
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Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
September 2007	9/1/2007	001	Odor, Severity	1/Week	1	0
September 2007	9/1/2007	001	Turbidity, Severity	1/Week	1	0
September 2007	9/1/2007	001	Water Temperature	1/Week	1	0
September 2007	9/8/2007	001	Water Temperature	1/Week	1	0
September 2007	9/15/2007	001	Color, Severity	1/Week	1	0
September 2007	9/15/2007	001	Odor, Severity	1/Week	1	0
September 2007	9/15/2007	001	Turbidity, Severity	1/Week	1	0
September 2007	9/15/2007	001	Water Temperature	1/Week	1	0
September 2007	9/22/2007	001	Color, Severity	1/Week	1	0
September 2007	9/22/2007	001	Odor, Severity	1/Week	1	0
September 2007	9/22/2007	001	Turbidity, Severity	1/Week	1	0
September 2007	9/22/2007	001	Water Temperature	1/Week	1	0

The above constitutes violations of the terms and conditions of your NPDES permit and, therefore, is subject to enforcement actions. Such actions can result in fines of up to \$10,000 per day of violation. Several of these violations have occurred in 2007. It appears from the data submitted that the facility has an issue with the ammonia and suspended solids that needs to be addressed. The system operates on a timer. To help improve the system, it may be necessary to increase the run time and the number of times that the aeration system operates to eliminate the problems. Please submit to Ohio EPA within 14 days of the date of this violation letter a plan of action to eliminate the above violations. The renewal of the permit may require a compliance schedule to upgrade the system if the action plan is not satisfactory.

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/State Road Ind. Devel./Permit and Compliance