



**Environmental
Protection Agency**

Robert Taft, Governor
Lester B. Froese, Lt. Governor
Chris Joneski, Director

July 20, 2010

RE: STATE ROAD INDUSTRIAL DEVELOPMENT
OHIO EPA PERMIT 3IE00012
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

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

Dear Mr. McVoy

On June 30, 2010, a site inspection was conducted at the above referenced facility at 600 State Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt, Lindsey Olmstead, and Sig Williams of this office. You represented State Road Industrial Development, LLC (SRID) 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 October 19, 2007.

The system consists of two septic tanks in series acting as a trash trap, extended aeration system with clarifier, and a final monitoring manhole. Sludge management consists of sludge removal from the extended aeration tank when needed to another POTW. The facility discharges to the Diamond Shamrock Tributary to Fields Brook south of the facility. No backup power is provided to the facility, and the facility is provided with no alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 1,000 gallons per day. The extended aeration plant operates on a timer. You indicated that the blowers have been rebuilt within the past two months.
2. The content of the aeration tank had a slight earthy odor, dark brown color with good mixing. The blower was running and the plant was receiving sufficient aeration. The plant was not returning any sludge. A chocolate brown color is an indicator of a properly operating aeration system.
3. The surface of the clarifier was covered in duckweed. Effluent channels and weirs appear to not have been scraped and cleaned in some time. Both the sludge return lines and skimmer were not operating properly at the time of the inspection.

4. The final discharge pipe at the Diamond Shamrock Tributary just east of State Road to the south of the plant was observed as flowing with a slightly turbid discharge.
5. Ohio EPA understands that you perform any daily operations at the WWTP, and monitor the facility. Microbac Laboratories performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.
6. The effluent monitoring manhole located at the southeast corner of the clarifier was full of grass clippings, leaves, and other organic debris. The manhole should be clean and free of debris so that samples collected at this location are representative of the plant's performance.
7. The final discharge along the banks of the Diamond Shamrock Tributary was overgrown with cattails and other vegetation. The area around the discharge should be managed in a manner to ensure that the discharge can be observed.

NPDES Permit Compliance Review

SRID operates under Permit 3IE00012*FD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2007 through June 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 reporting period reviewed:

<u>Station</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
001	00530	Total Suspended Solids	30D Conc	12	22.	8/1/2008
001	00530	Total Suspended Solids	7D Conc	18	22.	8/8/2008
001	00530	Total Suspended Solids	30D Qty	0.0455	.08327	8/1/2008
001	00530	Total Suspended Solids	7D Qty	0.0682	.08327	8/8/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	17.3	8/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	17.3	8/8/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0037	.06548	8/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0056	.06548	8/8/2008
001	80082	CBOD 5 day	30D Conc	10	15.	8/1/2008
001	80082	CBOD 5 day	30D Qty	0.0379	.05678	8/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	11.3	6/27/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	11.3	6/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.006	.04277	6/27/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.004	.04277	6/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	.9	6/27/2008

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	1D Conc	18	115.	12/6/2007
001	00530	Total Suspended Solids	30D Conc	12	115.	12/1/2007
001	00530	Total Suspended Solids	1D Qty	0.068	.43528	12/6/2007
001	00530	Total Suspended Solids	30D Qty	0.045	.43528	12/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.	12/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.011	.01514	12/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	2.1	12/6/2007
001	00530	Total Suspended Solids	1D Conc	18	117.	3/17/2008
001	00530	Total Suspended Solids	30D Conc	12	117.	3/1/2008
001	00530	Total Suspended Solids	1D Qty	0.068	.44285	3/17/2008
001	00530	Total Suspended Solids	30D Qty	0.045	.44285	3/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	5.9	3/17/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.9	3/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.017	.02233	3/17/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.011	.02233	3/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	2.5	3/17/2008
001	00530	Total Suspended Solids	30D Conc	12	67.	8/1/2009
001	00530	Total Suspended Solids	7D Conc	18	67.	8/8/2009
001	00530	Total Suspended Solids	30D Qty	0.0455	.2536	8/1/2009
001	00530	Total Suspended Solids	7D Qty	0.0682	.2536	8/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	5.1	8/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	5.1	8/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0037	.0193	8/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0056	.0193	8/8/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	8/12/2009
001	00530	Total Suspended Solids	30D Conc	12	80.	3/1/2009
001	00530	Total Suspended Solids	7D Conc	18	80.	3/22/2009
001	00530	Total Suspended Solids	30D Qty	0.0455	.3028	3/1/2009
001	00530	Total Suspended Solids	7D Qty	0.0682	.3028	3/22/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	10.6	3/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	10.6	3/22/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0114	.04012	3/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0171	.04012	3/22/2009
001	80082	CBOD 5 day	30D Conc	10	12.	3/1/2009
001	80082	CBOD 5 day	30D Qty	0.0379	.04542	3/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.	3/26/2009
001	00530	Total Suspended Solids	30D Conc	12	68.	12/1/2008
001	00530	Total Suspended Solids	7D Conc	18	68.	12/15/2008
001	00530	Total Suspended Solids	30D Qty	0.0455	.25738	12/1/2008
001	00530	Total Suspended Solids	7D Qty	0.0682	.25738	12/15/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	6.	12/15/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0114	.02271	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0171	.02271	12/15/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	2.1	12/15/2008

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	14.	6/1/2009
001	00530	Total Suspended Solids	30D Qty	0.0455	.05299	6/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	16.7	6/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0037	.06321	6/1/2009
001	31616	Fecal Coliform	30D Conc	1000	1200.	6/1/2009
001	80082	CBOD 5 day	30D Conc	10	14.	6/1/2009
001	80082	CBOD 5 day	30D Qty	0.0379	.05299	6/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	.2	6/29/2009
001	00530	Total Suspended Solids	30D Conc	12	50.	12/1/2009
001	00530	Total Suspended Solids	7D Conc	18	50.	12/8/2009
001	00530	Total Suspended Solids	30D Qty	0.0455	.18925	12/1/2009
001	00530	Total Suspended Solids	7D Qty	0.0682	.18925	12/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	11.6	12/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	11.6	12/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0114	.04391	12/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0171	.04391	12/8/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	12/14/2009
001	00530	Total Suspended Solids	30D Conc	12	288.	3/1/2010
001	00530	Total Suspended Solids	7D Conc	18	288.	3/15/2010
001	00530	Total Suspended Solids	30D Qty	0.0455	1.09008	3/1/2010
001	00530	Total Suspended Solids	7D Qty	0.0682	1.09008	3/15/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.1	3/1/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	6.1	3/15/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0114	.02309	3/1/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.0171	.02309	3/15/2010
001	80082	CBOD 5 day	30D Conc	10	11.	3/1/2010
001	80082	CBOD 5 day	30D Qty	0.0379	.04164	3/1/2010

These exceedances should be explained, along with measures to ensure that they are not repeated.

Reporting Violations

The following reporting code violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	8/12/2008
001	31616	Fecal Coliform			AK	6/27/2008

The improper use of these reporting codes should be explained, and the circumstances in which they were reported.

The following reporting frequency violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	11/01/2007
001	00083	Color, Severity	1/Week	1	0	11/01/2007
001	01330	Odor, Severity	1/Week	1	0	11/01/2007
001	01350	Turbidity, Severity	1/Week	1	0	11/01/2007
001	00010	Water Temperature	1/Week	1	0	11/08/2007
001	00083	Color, Severity	1/Week	1	0	11/08/2007
001	01330	Odor, Severity	1/Week	1	0	11/08/2007
001	01350	Turbidity, Severity	1/Week	1	0	11/08/2007
001	00010	Water Temperature	1/Week	1	0	11/15/2007
001	00010	Water Temperature	1/Week	1	0	11/22/2007
001	00083	Color, Severity	1/Week	1	0	11/22/2007
001	01330	Odor, Severity	1/Week	1	0	11/22/2007
001	01350	Turbidity, Severity	1/Week	1	0	11/22/2007
001	00010	Water Temperature	1/Week	1	0	12/01/2007
001	00400	pH	1/Quarter	1	0	12/01/2007
001	00010	Water Temperature	1/Week	1	0	12/08/2007
001	00083	Color, Severity	1/Week	1	0	12/08/2007
001	01330	Odor, Severity	1/Week	1	0	12/08/2007
001	01350	Turbidity, Severity	1/Week	1	0	12/08/2007
001	00010	Water Temperature	1/Week	1	0	12/15/2007
001	00083	Color, Severity	1/Week	1	0	12/15/2007
001	01330	Odor, Severity	1/Week	1	0	12/15/2007
001	01350	Turbidity, Severity	1/Week	1	0	12/15/2007
001	00010	Water Temperature	1/Week	1	0	12/22/2007
001	00083	Color, Severity	1/Week	1	0	12/22/2007
001	01330	Odor, Severity	1/Week	1	0	12/22/2007
001	01350	Turbidity, Severity	1/Week	1	0	12/22/2007
001	00010	Water Temperature	1/Week	1	0	01/01/2008
001	00010	Water Temperature	1/Week	1	0	01/08/2008
001	00083	Color, Severity	1/Week	1	0	01/08/2008
001	01330	Odor, Severity	1/Week	1	0	01/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	01/08/2008
001	00010	Water Temperature	1/Week	1	0	01/15/2008
001	00083	Color, Severity	1/Week	1	0	01/15/2008
001	01330	Odor, Severity	1/Week	1	0	01/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	01/15/2008
001	00010	Water Temperature	1/Week	1	0	01/22/2008
001	00083	Color, Severity	1/Week	1	0	01/22/2008
001	01330	Odor, Severity	1/Week	1	0	01/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	01/22/2008
001	00010	Water Temperature	1/Week	1	0	02/01/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Week	1	0	02/01/2008
001	01330	Odor, Severity	1/Week	1	0	02/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	02/01/2008
001	00010	Water Temperature	1/Week	1	0	02/08/2008
001	00083	Color, Severity	1/Week	1	0	02/08/2008
001	01330	Odor, Severity	1/Week	1	0	02/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	02/08/2008
001	00010	Water Temperature	1/Week	1	0	02/15/2008
001	00083	Color, Severity	1/Week	1	0	02/15/2008
001	01330	Odor, Severity	1/Week	1	0	02/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	02/15/2008
001	00010	Water Temperature	1/Week	1	0	02/22/2008
001	00010	Water Temperature	1/Week	1	0	03/01/2008
001	00083	Color, Severity	1/Week	1	0	03/01/2008
001	01330	Odor, Severity	1/Week	1	0	03/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	03/01/2008
001	00400	pH	1/Quarter	1	0	03/01/2008
001	00010	Water Temperature	1/Week	1	0	03/08/2008
001	00083	Color, Severity	1/Week	1	0	03/08/2008
001	01330	Odor, Severity	1/Week	1	0	03/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	03/08/2008
001	00010	Water Temperature	1/Week	1	0	03/15/2008
001	00010	Water Temperature	1/Week	1	0	03/22/2008
001	00083	Color, Severity	1/Week	1	0	03/22/2008
001	01330	Odor, Severity	1/Week	1	0	03/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	03/22/2008
001	00010	Water Temperature	1/Week	1	0	04/01/2008
001	00083	Color, Severity	1/Week	1	0	04/01/2008
001	01330	Odor, Severity	1/Week	1	0	04/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	04/01/2008
001	00010	Water Temperature	1/Week	1	0	04/08/2008
001	00010	Water Temperature	1/Week	1	0	04/15/2008
001	00083	Color, Severity	1/Week	1	0	04/15/2008
001	01330	Odor, Severity	1/Week	1	0	04/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	04/15/2008
001	00010	Water Temperature	1/Week	1	0	04/22/2008
001	00083	Color, Severity	1/Week	1	0	04/22/2008
001	01330	Odor, Severity	1/Week	1	0	04/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	04/22/2008
001	00010	Water Temperature	1/Week	1	0	05/01/2008
001	00010	Water Temperature	1/Week	1	0	05/08/2008
001	00083	Color, Severity	1/Week	1	0	05/08/2008
001	01330	Odor, Severity	1/Week	1	0	05/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	05/08/2008
001	00010	Water Temperature	1/Week	1	0	05/15/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Week	1	0	05/15/2008
001	01330	Odor, Severity	1/Week	1	0	05/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	05/15/2008
001	00010	Water Temperature	1/Week	1	0	05/22/2008
001	00083	Color, Severity	1/Week	1	0	05/22/2008
001	01330	Odor, Severity	1/Week	1	0	05/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	05/22/2008
001	00010	Water Temperature	1/Week	1	0	06/01/2008
001	00083	Color, Severity	1/Week	1	0	06/01/2008
001	01330	Odor, Severity	1/Week	1	0	06/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	06/01/2008
001	00400	pH	1/Quarter	1	0	06/01/2008
001	00010	Water Temperature	1/Week	1	0	06/08/2008
001	00083	Color, Severity	1/Week	1	0	06/08/2008
001	01330	Odor, Severity	1/Week	1	0	06/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	06/08/2008
001	00010	Water Temperature	1/Week	1	0	06/15/2008
001	00083	Color, Severity	1/Week	1	0	06/15/2008
001	01330	Odor, Severity	1/Week	1	0	06/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	06/15/2008
001	00010	Water Temperature	1/Week	1	0	06/22/2008
001	00010	Water Temperature	1/Week	1	0	07/01/2008
001	00083	Color, Severity	1/Week	1	0	07/01/2008
001	01330	Odor, Severity	1/Week	1	0	07/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	07/01/2008
001	00010	Water Temperature	1/Week	1	0	07/08/2008
001	00083	Color, Severity	1/Week	1	0	07/08/2008
001	01330	Odor, Severity	1/Week	1	0	07/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	07/08/2008
001	00010	Water Temperature	1/Week	1	0	07/15/2008
001	00083	Color, Severity	1/Week	1	0	07/15/2008
001	01330	Odor, Severity	1/Week	1	0	07/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	07/15/2008
001	00010	Water Temperature	1/Week	1	0	07/22/2008
001	00083	Color, Severity	1/Week	1	0	07/22/2008
001	01330	Odor, Severity	1/Week	1	0	07/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	07/22/2008
001	00010	Water Temperature	1/Week	1	0	08/01/2008
001	00083	Color, Severity	1/Week	1	0	08/01/2008
001	01330	Odor, Severity	1/Week	1	0	08/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	08/01/2008
001	00400	pH	1/Quarter	1	0	08/01/2008
001	00010	Water Temperature	1/Week	1	0	08/08/2008
001	00010	Water Temperature	1/Week	1	0	08/15/2008
001	00083	Color, Severity	1/Week	1	0	08/15/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Week	1	0	08/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	08/15/2008
001	00010	Water Temperature	1/Week	1	0	08/22/2008
001	00083	Color, Severity	1/Week	1	0	08/22/2008
001	01330	Odor, Severity	1/Week	1	0	08/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	08/22/2008
001	00010	Water Temperature	1/Week	1	0	09/01/2008
001	00083	Color, Severity	1/Week	1	0	09/01/2008
001	01330	Odor, Severity	1/Week	1	0	09/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	09/01/2008
001	00010	Water Temperature	1/Week	1	0	09/08/2008
001	00083	Color, Severity	1/Week	1	0	09/08/2008
001	01330	Odor, Severity	1/Week	1	0	09/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	09/08/2008
001	00010	Water Temperature	1/Week	1	0	09/15/2008
001	00083	Color, Severity	1/Week	1	0	09/15/2008
001	01330	Odor, Severity	1/Week	1	0	09/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	09/15/2008
001	00010	Water Temperature	1/Week	1	0	09/22/2008
001	00010	Water Temperature	1/Week	1	0	11/01/2008
001	00083	Color, Severity	1/Week	1	0	11/01/2008
001	01330	Odor, Severity	1/Week	1	0	11/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	11/01/2008
001	00010	Water Temperature	1/Week	1	0	11/08/2008
001	00083	Color, Severity	1/Week	1	0	11/08/2008
001	01330	Odor, Severity	1/Week	1	0	11/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	11/08/2008
001	00010	Water Temperature	1/Week	1	0	11/15/2008
001	00083	Color, Severity	1/Week	1	0	11/15/2008
001	01330	Odor, Severity	1/Week	1	0	11/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	11/15/2008
001	00010	Water Temperature	1/Week	1	0	11/22/2008
001	00010	Water Temperature	1/Week	1	0	12/01/2008
001	00083	Color, Severity	1/Week	1	0	12/01/2008
001	01330	Odor, Severity	1/Week	1	0	12/01/2008
001	01350	Turbidity, Severity	1/Week	1	0	12/01/2008
001	00400	pH	1/Quarter	1	0	12/01/2008
001	00010	Water Temperature	1/Week	1	0	12/08/2008
001	00083	Color, Severity	1/Week	1	0	12/08/2008
001	01330	Odor, Severity	1/Week	1	0	12/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	12/08/2008
001	00010	Water Temperature	1/Week	1	0	12/15/2008
001	00010	Water Temperature	1/Week	1	0	12/22/2008
001	00083	Color, Severity	1/Week	1	0	12/22/2008
001	01330	Odor, Severity	1/Week	1	0	12/22/2008

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Week	1	0	12/22/2008
001	00010	Water Temperature	1/Week	1	0	01/01/2009
001	00083	Color, Severity	1/Week	1	0	01/01/2009
001	01330	Odor, Severity	1/Week	1	0	01/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	01/01/2009
001	00010	Water Temperature	1/Week	1	0	01/08/2009
001	00083	Color, Severity	1/Week	1	0	01/08/2009
001	01330	Odor, Severity	1/Week	1	0	01/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	01/08/2009
001	00010	Water Temperature	1/Week	1	0	01/15/2009
001	00083	Color, Severity	1/Week	1	0	01/15/2009
001	01330	Odor, Severity	1/Week	1	0	01/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	01/15/2009
001	00010	Water Temperature	1/Week	1	0	01/22/2009
001	00010	Water Temperature	1/Week	1	0	02/01/2009
001	00083	Color, Severity	1/Week	1	0	02/01/2009
001	01330	Odor, Severity	1/Week	1	0	02/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	02/01/2009
001	00010	Water Temperature	1/Week	1	0	02/08/2009
001	00010	Water Temperature	1/Week	1	0	02/15/2009
001	00083	Color, Severity	1/Week	1	0	02/15/2009
001	01330	Odor, Severity	1/Week	1	0	02/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	02/15/2009
001	00010	Water Temperature	1/Week	1	0	02/22/2009
001	00083	Color, Severity	1/Week	1	0	02/22/2009
001	01330	Odor, Severity	1/Week	1	0	02/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	02/22/2009
001	00010	Water Temperature	1/Week	1	0	03/01/2009
001	00083	Color, Severity	1/Week	1	0	03/01/2009
001	01330	Odor, Severity	1/Week	1	0	03/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	03/01/2009
001	00400	pH	1/Quarter	1	0	03/01/2009
001	00010	Water Temperature	1/Week	1	0	03/08/2009
001	00083	Color, Severity	1/Week	1	0	03/08/2009
001	01330	Odor, Severity	1/Week	1	0	03/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	03/08/2009
001	00010	Water Temperature	1/Week	1	0	03/15/2009
001	00083	Color, Severity	1/Week	1	0	03/15/2009
001	01330	Odor, Severity	1/Week	1	0	03/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	03/15/2009
001	00010	Water Temperature	1/Week	1	0	03/22/2009
001	00010	Water Temperature	1/Week	1	0	04/01/2009
001	00083	Color, Severity	1/Week	1	0	04/01/2009
001	01330	Odor, Severity	1/Week	1	0	04/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	04/01/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	04/08/2009
001	00010	Water Temperature	1/Week	1	0	04/15/2009
001	00083	Color, Severity	1/Week	1	0	04/15/2009
001	01330	Odor, Severity	1/Week	1	0	04/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	04/15/2009
001	00010	Water Temperature	1/Week	1	0	04/22/2009
001	00083	Color, Severity	1/Week	1	0	04/22/2009
001	01330	Odor, Severity	1/Week	1	0	04/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	04/22/2009
001	00010	Water Temperature	1/Week	1	0	06/01/2009
001	00083	Color, Severity	1/Week	1	0	06/01/2009
001	01330	Odor, Severity	1/Week	1	0	06/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	06/01/2009
001	00400	pH	1/Quarter	1	0	06/01/2009
001	00010	Water Temperature	1/Week	1	0	06/08/2009
001	00083	Color, Severity	1/Week	1	0	06/08/2009
001	01330	Odor, Severity	1/Week	1	0	06/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	06/08/2009
001	00010	Water Temperature	1/Week	1	0	06/15/2009
001	00083	Color, Severity	1/Week	1	0	06/15/2009
001	01330	Odor, Severity	1/Week	1	0	06/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	06/15/2009
001	00010	Water Temperature	1/Week	1	0	06/22/2009
001	00083	Color, Severity	1/Week	1	0	06/22/2009
001	01330	Odor, Severity	1/Week	1	0	06/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	06/22/2009
001	00010	Water Temperature	1/Week	1	0	07/01/2009
001	00083	Color, Severity	1/Week	1	0	07/01/2009
001	01330	Odor, Severity	1/Week	1	0	07/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	07/01/2009
001	00010	Water Temperature	1/Week	1	0	07/08/2009
001	00083	Color, Severity	1/Week	1	0	07/08/2009
001	01330	Odor, Severity	1/Week	1	0	07/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	07/08/2009
001	00010	Water Temperature	1/Week	1	0	07/15/2009
001	00083	Color, Severity	1/Week	1	0	07/15/2009
001	01330	Odor, Severity	1/Week	1	0	07/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	07/15/2009
001	00010	Water Temperature	1/Week	1	0	07/22/2009
001	00083	Color, Severity	1/Week	1	0	07/22/2009
001	01330	Odor, Severity	1/Week	1	0	07/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	07/22/2009
001	00010	Water Temperature	1/Week	1	0	08/01/2009
001	00083	Color, Severity	1/Week	1	0	08/01/2009
001	01330	Odor, Severity	1/Week	1	0	08/01/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Week	1	0	08/01/2009
001	00400	pH	1/Quarter	1	0	08/01/2009
001	00010	Water Temperature	1/Week	1	0	08/08/2009
001	00010	Water Temperature	1/Week	1	0	08/15/2009
001	00083	Color, Severity	1/Week	1	0	08/15/2009
001	01330	Odor, Severity	1/Week	1	0	08/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	08/15/2009
001	00010	Water Temperature	1/Week	1	0	08/22/2009
001	00083	Color, Severity	1/Week	1	0	08/22/2009
001	01330	Odor, Severity	1/Week	1	0	08/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	08/22/2009
001	00010	Water Temperature	1/Week	1	0	09/01/2009
001	00083	Color, Severity	1/Week	1	0	09/01/2009
001	01330	Odor, Severity	1/Week	1	0	09/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	09/01/2009
001	00010	Water Temperature	1/Week	1	0	09/08/2009
001	00010	Water Temperature	1/Week	1	0	09/15/2009
001	00083	Color, Severity	1/Week	1	0	09/15/2009
001	01330	Odor, Severity	1/Week	1	0	09/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	09/15/2009
001	00010	Water Temperature	1/Week	1	0	09/22/2009
001	00083	Color, Severity	1/Week	1	0	09/22/2009
001	01330	Odor, Severity	1/Week	1	0	09/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	09/22/2009
001	00010	Water Temperature	1/Week	1	0	10/01/2009
001	00083	Color, Severity	1/Week	1	0	10/01/2009
001	01330	Odor, Severity	1/Week	1	0	10/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	10/01/2009
001	00010	Water Temperature	1/Week	1	0	10/08/2009
001	00083	Color, Severity	1/Week	1	0	10/08/2009
001	01330	Odor, Severity	1/Week	1	0	10/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	10/08/2009
001	00010	Water Temperature	1/Week	1	0	10/15/2009
001	00010	Water Temperature	1/Week	1	0	10/22/2009
001	00083	Color, Severity	1/Week	1	0	10/22/2009
001	01330	Odor, Severity	1/Week	1	0	10/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	10/22/2009
001	00010	Water Temperature	1/Week	1	0	11/01/2009
001	00083	Color, Severity	1/Week	1	0	11/01/2009
001	01330	Odor, Severity	1/Week	1	0	11/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	11/01/2009
001	00010	Water Temperature	1/Week	1	0	11/08/2009
001	00083	Color, Severity	1/Week	1	0	11/08/2009
001	01330	Odor, Severity	1/Week	1	0	11/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	11/08/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	11/15/2009
001	00010	Water Temperature	1/Week	1	0	11/22/2009
001	00083	Color, Severity	1/Week	1	0	11/22/2009
001	01330	Odor, Severity	1/Week	1	0	11/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	11/22/2009
001	00010	Water Temperature	1/Week	1	0	12/01/2009
001	00083	Color, Severity	1/Week	1	0	12/01/2009
001	01330	Odor, Severity	1/Week	1	0	12/01/2009
001	01350	Turbidity, Severity	1/Week	1	0	12/01/2009
001	00400	pH	1/Quarter	1	0	12/01/2009
001	00010	Water Temperature	1/Week	1	0	12/08/2009
001	00010	Water Temperature	1/Week	1	0	12/15/2009
001	00083	Color, Severity	1/Week	1	0	12/15/2009
001	01330	Odor, Severity	1/Week	1	0	12/15/2009
001	01350	Turbidity, Severity	1/Week	1	0	12/15/2009
001	00010	Water Temperature	1/Week	1	0	12/22/2009
001	00083	Color, Severity	1/Week	1	0	12/22/2009
001	01330	Odor, Severity	1/Week	1	0	12/22/2009
001	01350	Turbidity, Severity	1/Week	1	0	12/22/2009
001	00010	Water Temperature	1/Week	1	0	01/01/2010
001	00083	Color, Severity	1/Week	1	0	01/01/2010
001	01330	Odor, Severity	1/Week	1	0	01/01/2010
001	01350	Turbidity, Severity	1/Week	1	0	01/01/2010
001	00010	Water Temperature	1/Week	1	0	01/08/2010
001	00083	Color, Severity	1/Week	1	0	01/08/2010
001	01330	Odor, Severity	1/Week	1	0	01/08/2010
001	01350	Turbidity, Severity	1/Week	1	0	01/08/2010
001	00010	Water Temperature	1/Week	1	0	01/15/2010
001	00083	Color, Severity	1/Week	1	0	01/15/2010
001	01330	Odor, Severity	1/Week	1	0	01/15/2010
001	01350	Turbidity, Severity	1/Week	1	0	01/15/2010
001	00010	Water Temperature	1/Week	1	0	01/22/2010
001	00010	Water Temperature	1/Week	1	0	02/01/2010
001	00083	Color, Severity	1/Week	1	0	02/01/2010
001	01330	Odor, Severity	1/Week	1	0	02/01/2010
001	01350	Turbidity, Severity	1/Week	1	0	02/01/2010
001	00010	Water Temperature	1/Week	1	0	02/08/2010
001	00083	Color, Severity	1/Week	1	0	02/08/2010
001	01330	Odor, Severity	1/Week	1	0	02/08/2010
001	01350	Turbidity, Severity	1/Week	1	0	02/08/2010
001	00010	Water Temperature	1/Week	1	0	02/15/2010
001	00083	Color, Severity	1/Week	1	0	02/15/2010
001	01330	Odor, Severity	1/Week	1	0	02/15/2010
001	01350	Turbidity, Severity	1/Week	1	0	02/15/2010
001	00010	Water Temperature	1/Week	1	0	02/22/2010

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	03/01/2010
001	00083	Color, Severity	1/Week	1	0	03/01/2010
001	01330	Odor, Severity	1/Week	1	0	03/01/2010
001	01350	Turbidity, Severity	1/Week	1	0	03/01/2010
001	00400	pH	1/Quarter	1	0	03/01/2010
001	00010	Water Temperature	1/Week	1	0	03/08/2010
001	00083	Color, Severity	1/Week	1	0	03/08/2010
001	01330	Odor, Severity	1/Week	1	0	03/08/2010
001	01350	Turbidity, Severity	1/Week	1	0	03/08/2010
001	00010	Water Temperature	1/Week	1	0	03/15/2010
001	00010	Water Temperature	1/Week	1	0	03/22/2010
001	00083	Color, Severity	1/Week	1	0	03/22/2010
001	01330	Odor, Severity	1/Week	1	0	03/22/2010
001	01350	Turbidity, Severity	1/Week	1	0	03/22/2010
001	00010	Water Temperature	1/Week	1	0	04/01/2010
001	00083	Color, Severity	1/Week	1	0	04/01/2010
001	01330	Odor, Severity	1/Week	1	0	04/01/2010
001	01350	Turbidity, Severity	1/Week	1	0	04/01/2010
001	00010	Water Temperature	1/Week	1	0	04/08/2010
001	00010	Water Temperature	1/Week	1	0	04/15/2010
001	00083	Color, Severity	1/Week	1	0	04/15/2010
001	01330	Odor, Severity	1/Week	1	0	04/15/2010
001	01350	Turbidity, Severity	1/Week	1	0	04/15/2010
001	00010	Water Temperature	1/Week	1	0	04/22/2010
001	00083	Color, Severity	1/Week	1	0	04/22/2010
001	01330	Odor, Severity	1/Week	1	0	04/22/2010
001	01350	Turbidity, Severity	1/Week	1	0	04/22/2010
001	00010	Water Temperature	1/Week	1	0	05/01/2010
001	01350	Turbidity, Severity	1/Week	1	0	05/08/2010
001	00010	Water Temperature	1/Week	1	0	05/08/2010
001	00083	Color, Severity	1/Week	1	0	05/08/2010
001	01330	Odor, Severity	1/Week	1	0	05/08/2010
001	01350	Turbidity, Severity	1/Week	1	0	05/15/2010
001	00010	Water Temperature	1/Week	1	0	05/15/2010
001	00083	Color, Severity	1/Week	1	0	05/15/2010
001	01330	Odor, Severity	1/Week	1	0	05/15/2010
001	01350	Turbidity, Severity	1/Week	1	0	05/22/2010
001	00010	Water Temperature	1/Week	1	0	05/22/2010
001	00083	Color, Severity	1/Week	1	0	05/22/2010
001	01330	Odor, Severity	1/Week	1	0	05/22/2010

These reporting frequency violations should be explained, along with measures to ensure that they are not repeated. It appears that these violations are daily readings for odor, color, and turbidity and are limited to the last week of April and the first two weeks

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of May 2009. The Owner and Operator should clarify responsibilities for noting the daily readings (except weekends and holidays) in the facility log and to ensure that they are properly reported in the eDMR. Reporting codes for weekends and holidays should be used as necessary.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

The following compliance schedule violations were noted for the reporting period reviewed:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
7/1/2008	6/30/2013	9/1/2008	12/11/2008	1699	Construction	Final Plan Approved
7/1/2008	6/30/2013	11/1/2008	Not Completed	3099	Construction	Begin Construction
7/1/2008	6/30/2013	1/1/2009	Not Completed	4599	Construction	End Construction
7/1/2008	6/30/2013	3/1/2009	Not Completed	5599	Construction	Operational Level Attained

Ohio EPA understands that the current WWTP and proposed WWTP are on property owned by RMI, and that an existing lease/easement would need to be modified to facilitate construction of the new WWTP. As PTI 651146 for the WWTP improvements was issued on December 11, 2008, pursuant to Ohio Revised Code Chapter 6111 and Ohio Administrative Code (OAC) Chapter 3745-42, implementation of construction for a PTI must occur within eighteen months of issuance. As more than eighteen months have elapsed since issuance of PTI 651146, the permit application must be resubmitted, along with the appropriate application fee, and the PTI reissued. Consideration may be given to relocating the proposed WWTP on property currently owned by SRID in order to avoid further issues obtaining permission from RMI for implementation of the PTI.

Other Violations

1. Failure to Submit all Data Required by your Discharge Monitoring Reports - Pursuant to Part III, Item 4 of your NPDES permit, State Road Industrial development, LLC is required to submit the required DMR data for all parameters as prescribed by your NPDES permit. Ohio EPA has not received data for all parameters, only the monthly parameters collected by Microbac Laboratories.

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If you need assistance in establishing an eDMR account to submit the required data electronically to Ohio EPA, please go to <http://epa.ohio.gov/dsw/edmr/eDMR.aspx>. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program.

Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.

2. Failure to Contract with a Licensed Wastewater Plant Operator - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. State Road Industrial development, LLC may contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation of the WWTP provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. During our June 30, 2010 site visit, you indicated a desire to contract with an approved operator. State Road Industrial Development, LLC must formally notify Ohio EPA of its designated operator of record. Necessary forms for doing this may be found on the Web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please note that Ohio rules (Ohio Administrative Code 3745-7-04) obligate the operator of record to inspect and maintain the facility with a minimum number of visits and a specified duration of each visit per week, as well as being available to respond to any emergencies if and when they arise. To-date, Ohio EPA has not received a contract with an appropriately certified operator. For your reference, I have attached a list of certified contract operators.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP and notified Ohio EPA central office of the operator of record.

Frequency violations continue to occur monthly. The current expired permit must be reviewed so that all parameters are reported at the proper frequency. Please be advised that failure to submit complete DMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. While significant improvements have been made at this facility over earlier inspections, State Road Industrial Development, LLC remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement

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actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 14 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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

Encl: List of Certified Operators, 05/2010

File: State Road Industrial Development/Industrial P/C