



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

February 3, 2010

RE: THERM-O-LINK, INC.
PERMIT NO. 3IQ00059
PORTAGE COUNTY
GARRETTSVILLE

Dr. Vipin M. Kothari
Therm-O-Link, Inc.
10513 Freedom Street
Garrettsville, Ohio 44231

Dear Mr. Kothari:

On January 12, 2010, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Kevin Trembath, Chemist and you. The purpose of the inspection was to verify the facility's use of process cooling water, examine the point of discharge to Waters of the State and evaluate the facility's general compliance with its NPDES permit.

During the inspection, the following items were noted/discussed:

1. Mr. Trembath collects the samples for the Laboratory.
2. Northcoast Laboratory from Twinsburg provides the sample containers and preservative and performs the analytical analysis. You indicated that the samples are placed in a cooler but were not sure if the samples were iced down. **The samples should be iced down or kept cool with ice packs.**
3. The facility's permit requires that a Stormwater Pollution Prevention Plan be prepared within six months of the effective date of the facility's NPDES permit. The effective date of the facility's NPDES permit was March 1, 2007. To date, no Stormwater Pollution Prevention Plan has been prepared. **Therm-O-Link should begin preparing this plan immediately.** Part IV of the facility's permit details the contents of what that plan shall include. A copy of this plan shall be kept at the site and be available for inspection at all times.
4. Part V of the facility's permit will require annual sampling at station 3IQ00059**004**. The monitoring requirements are specified in Part V.B.
5. Outfall 3IQ00059**003** was not able to be inspected. The lock on the gate providing access to the outfall was frozen.
6. The facility began submitting the monthly discharge monitoring reports through Ohio EPA's Web-based Surface Water Information Management System (SWIMS) in April 2009.

7. In reference to the facility's Preliminary Compliance Review for August 2009, you stated that there was some kind of glitch on Ohio EPA's end. Review of the data that was submitted to Ohio EPA for flow rate was incorrect. The flow rate is required to be reported be in Million Gallons per Day (MGD). The flow data which was reported was in the range of 3 MGD to 28 MGD. It appears that an error in the placement of the decimal point on your end was made. **The Discharge monitoring Report for August 2009 needs to be amended through Ohio EPA's SWIMS system.**

This office has recently reviewed your self-monitoring reports covering the period November 1, 2006 through December 31, 2009 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	80082	CBOD 5 day	1D Conc	26	50.	11/22/2006
602	80082	CBOD 5 day	1D Qty	3.9	6.54805	11/22/2006
602	80082	CBOD 5 day	1D Conc	26	33.	3/28/2007
602	80082	CBOD 5 day	1D Qty	3.9	4.8588	3/28/2007
602	80082	CBOD 5 day	1D Conc	26	43.	10/29/2007
602	80082	CBOD 5 day	1D Qty	3.9	7.975	10/29/2007
602	80082	CBOD 5 day	1D Qty	3.9	75.7	8/27/2009
602	00550	Oil and Grease, Total	1D Qty	4.4	113.55	8/27/2009

FREQUENCY VIOLATIONS

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
003	00011	Water Temperature	1/Week	1	0	02/01/2007
003	00011	Water Temperature	1/Week	1	0	02/08/2007
003	00011	Water Temperature	1/Week	1	0	02/22/2007
003	00400	pH	1/Week	1	0	03/01/2007
003	00400	pH	1/Week	1	0	03/08/2007
003	00400	pH	1/Week	1	0	03/15/2007
003	00400	pH	1/Week	1	0	03/22/2007
003	00400	pH	1/Week	1	0	04/01/2007
003	00400	pH	1/Week	1	0	04/08/2007
003	00400	pH	1/Week	1	0	04/15/2007
003	00400	pH	1/Week	1	0	04/22/2007
003	00400	pH	1/Week	1	0	05/01/2007

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
003	00400	pH	1/Week	1	0	05/08/2007
003	00400	pH	1/Week	1	0	05/15/2007
003	00400	pH	1/Week	1	0	05/22/2007
003	00400	pH	1/Week	1	0	06/01/2007
003	00011	Water Temperature	1/Week	1	0	06/01/2007
003	00400	pH	1/Week	1	0	06/08/2007
003	00400	pH	1/Week	1	0	06/15/2007
003	00400	pH	1/Week	1	0	06/22/2007
003	00400	pH	1/Week	1	0	07/01/2007
003	00400	pH	1/Week	1	0	07/08/2007
003	00400	pH	1/Week	1	0	07/15/2007
003	00400	pH	1/Week	1	0	07/22/2007
003	00400	pH	1/Week	1	0	08/01/2007
003	00011	Water Temperature	1/Week	1	0	08/01/2007
003	00400	pH	1/Week	1	0	08/08/2007
003	00400	pH	1/Week	1	0	08/15/2007
003	00400	pH	1/Week	1	0	08/22/2007
003	00400	pH	1/Week	1	0	09/01/2007
003	00400	pH	1/Week	1	0	09/08/2007
003	00400	pH	1/Week	1	0	09/15/2007
003	00400	pH	1/Week	1	0	09/22/2007
003	00400	pH	1/Week	1	0	10/01/2007
003	00400	pH	1/Week	1	0	10/08/2007
003	00400	pH	1/Week	1	0	10/15/2007
003	00400	pH	1/Week	1	0	10/22/2007
003	00400	pH	1/Week	1	0	11/01/2007
003	00400	pH	1/Week	1	0	11/08/2007
003	00400	pH	1/Week	1	0	11/15/2007
003	00400	pH	1/Week	1	0	11/22/2007
003	00400	pH	1/Week	1	0	12/01/2007
003	00400	pH	1/Week	1	0	12/08/2007
003	00400	pH	1/Week	1	0	12/15/2007
003	00400	pH	1/Week	1	0	12/22/2007
003	00400	pH	1/Week	1	0	01/01/2008
003	00400	pH	1/Week	1	0	01/08/2008
003	00400	pH	1/Week	1	0	01/15/2008
003	00400	pH	1/Week	1	0	01/22/2008
003	00400	pH	1/Week	1	0	02/01/2008
003	00400	pH	1/Week	1	0	02/08/2008
003	00400	pH	1/Week	1	0	02/15/2008
003	00400	pH	1/Week	1	0	02/22/2008
003	00400	pH	1/Week	1	0	03/01/2008
003	00400	pH	1/Week	1	0	03/08/2008

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003	00400	pH	1/Week	1	0	04/08/2008
003	00400	pH	1/Week	1	0	04/15/2008
003	00400	pH	1/Week	1	0	04/22/2008
003	00400	pH	1/Week	1	0	12/01/2008
003	00400	pH	1/Week	1	0	12/08/2008
003	00400	pH	1/Week	1	0	12/15/2008
003	00400	pH	1/Week	1	0	12/22/2008
003	00400	pH	1/Week	1	0	01/01/2009
003	00400	pH	1/Week	1	0	01/08/2009
003	00400	pH	1/Week	1	0	01/15/2009
003	00400	pH	1/Week	1	0	01/22/2009
003	00400	pH	1/Week	1	0	02/01/2009
003	00400	pH	1/Week	1	0	02/08/2009
003	00400	pH	1/Week	1	0	02/15/2009
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003	00400	pH	1/Week	1	0	03/15/2009
003	00400	pH	1/Week	1	0	04/01/2009
003	00400	pH	1/Week	1	0	04/08/2009
003	00011	Water Temperature	1/Week	1	0	04/08/2009
003	00400	pH	1/Week	1	0	04/15/2009
602	39100	Bis(2-ethylhexyl) Phth	1/Quarter	1	0	12/01/2007
602	39100	Bis(2-ethylhexyl) Phth	1/Quarter	1	0	12/01/2009

This office has no record of receiving the required monthly Discharge Monitoring Reports for the following months:

May 2008 through November 2008
 May 2009
 June 2009
 August 2009 (flow rate needs to be amended)

This data needs to be electronically submitted through Ohio EPA Surface Water Information Management System (SWIMS) immediately.

Please notify this office in writing within 14 days receipt of this letter your intention to:

Dr. Vipin M. Kothari
Therm-O-Link, Inc.
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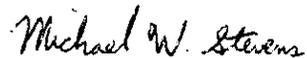
- A. Electronically submit the above referenced discharge monitoring reports**
- B. Address the ongoing violations**
- C. Prepare a Stormwater Pollution Prevention Plan.**

The letter should include dates either actual or proposed.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt