



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

January 6, 2010

RE: KRAFT FOODS  
PERMIT NO. 3IN00340  
LORAIN COUNTY

Mr. John Wharton  
EHSQ Manager  
United Initiators, Inc.  
555 Garden Street  
Elyria, Ohio 44035

Dear Mr. Wharton:

On January 5, 2010, an inspection of the above referenced facility's groundwater treatment system was conducted. The facility was represented by you. The purpose of the inspection was to evaluate the performance of the groundwater treatment system along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

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

1. The groundwater recovery system has been shut down since August 2009 per the recommendations of Ohio EPA's Division of Hazardous Waste Management (DHWM). The DHWM indicated that the concentrations of the contaminants are low enough at the site that the extraction system is no longer efficient at removing contamination from the groundwater.
2. Environmental services previously provided by Weston Solutions Inc. have been terminated.
3. United Initiators' contract to perform the manual maintenance on the groundwater treatment system was also terminated when the groundwater remediation system's two extraction wells ceased operation.
4. Environ has been contracted to oversee the remainder of the groundwater remediation activities being conducted at the facility.
5. Environ has been contracted to monitor the groundwater on a quarterly basis for eight consecutive quarters to determine if closure can be achieved without additional remedial actions at the site.
6. To date, two quarters of sampling has been conducted.
7. No discharge has occurred at outfall 3IN00340001 since the treatment system has been shut down.
8. All groundwater collected during quarterly sampling is containerized until pending Laboratory results are reviewed. If the results are acceptable, the containerized groundwater is treated in the facility's wastewater treatment system and discharged to the City of Elyria's WWTP.

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This office has recently reviewed your self-monitoring reports covering the period October 1, 2008 through October 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
001	80082	CBOD 5 day	30D Conc	10	14.	10/1/2008
001	80082	CBOD 5 day	30D Conc	10	44.	12/1/2008
001	80082	CBOD 5 day	1D Conc	15	44.	12/10/2008
001	80082	CBOD 5 day	30D Conc	10	29.	2/1/2009
001	80082	CBOD 5 day	1D Conc	15	29.	2/13/2009
001	00530	Total Suspended Solids	30D Conc	12	14.	5/1/2009
001	80082	CBOD 5 day	30D Conc	10	29.	7/1/2009
001	80082	CBOD 5 day	1D Conc	15	29.	7/8/2009

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*

Michael W. Stevens  
Environmental Engineer  
Division of surface Water

MWS/mt