Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 28, 2010

RE: RESERVE ENVIRONMENTAL SERVICES
OHIO EPA PERMIT 3IN00145
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Yogi Chokshi, President
Reserve Environmental Services, Inc.
4633 Middle Road
Ashtabula, OH 44004

Dear Mr. Chokshi:

On September 14, 2010, a site inspection was conducted at the above referenced facility at 4633 Middle Road, Ashtabula Township, Ashtabula County. Representing Ohio EPA during the inspection included John Schmidt, Erm Gomes, and Tomas Parry. Ms. Lisa Specht and Mr. Bernie Roskovics represented Reserve Environmental Services, Inc. (RES) 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 for the areas examined. The last compliance inspection was conducted on May 28, 2009.

Ohio EPA notes that wastewater treatment consists of separate treatment systems for hazardous and nonhazardous liquid wastes, contaminated ground water, leachate from a variety of active/inactive disposal units, sanitary wastes, and storm water. The following waste streams are treated in the following manner:

Contaminated Ground Water Treatment System
Contaminated ground water is treated by chemical precipitation, sedimentation (settling) and neutralization (pH adjustment), air stripping, and carbon absorption for discharge to an unnamed tributary to Whitman Creek as final Outfall 001. Sludge is processed through a plate filter press, where it is removed for off-site disposal.

RCRA C Landfill Leachate (Sites C, D, and E) Treatment System
Leachate from inactive RCRA disposal sites (Sites C, D, and E) are treated by chemical precipitation (lime, hydrogen sulfide), sedimentation (settling) and neutralization (pH adjustment) prior to an unnamed tributary to Whitman's Creek as Outfall 001. Sludge is processed through a plate filter press, where it is removed for off-site disposal.

RCRA D Landfill Leachate Treatment (Site B)
Landfill leachate is collected in a leachate pond, then is combined in a settling pond, where it is pumped to the final tank in the microfiltration unit (MFU) building. It is comingled with the effluent from the MFU in the final settling tank prior to being monitored as internal monitoring point Station 604.

Plant Sanitary Wastes Treatment System
Plant sanitary wastes are treated by an activated sludge treatment, slow sand filtration, and chlorination disinfection prior to discharge to the Middle Road ditch to an unnamed tributary of Whitman Creek as Outfall 003. An internal monitoring station for the sanitary WWTP is monitored as Station 603. Sludge is removed from the clarifier on an as-needed basis and hauled to another POTW.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

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Storm Water Treatment

Storm water from the western process areas and parking areas are treated through a sedimentation pond located at the southwest corner of the property along Middle Road, and discharged to the Middle Road ditch at the southeast corner of the property as Outfall 003. Storm water from south end of inactive lagoons 3, 4, 5, and 6 are treated through a sedimentation pond prior to discharge to the Middle Road ditch located at the southwest corner of the intersection of Middle Road and LaBounty Road as Outfall 004. Storm water from north end of inactive lagoons 3, 4, 5, and 6 are treated through a sedimentation pond prior to discharge to another unnamed tributary to Whitman Creek located at the north of Ponds 3-6 as Outfall 005. Storm water from inactive hazardous waste disposal units (Sites C, D, E) located east of LaBounty Road are treated through a series of sedimentation ponds prior to discharge as Outfall 007.

Hazardous/Nonhazardous Liquid Wastes Treatment System

Hazardous/nonhazardous liquid wastes are treated by micro-straining, chemical precipitation, sedimentation (Settling) neutralization (pH adjustment) activated carbon, and microfiltration, passing through an internal outfall (Outfall 604) prior to final discharge to Lake Erie at Outfall 006. A process flow map is attached. Sludge is processed through a plate filter press, where it is removed for off-site disposal.

Observations

The following observations were made of various treatment processes during the inspection:

Contaminated Ground Water Treatment System

1. The plant operates in batches as needed, with the amount of ground water to treat depending upon local hydrologic conditions. The design of the plant is 2,000 gpd (0.002 MGD). The plant was operating at the time of the inspection.

2. The plant was found in overall satisfactory condition. Plant equipment was found reasonably clean and operational. Outfall 001 appeared to be of satisfactory visual quality.

RCRA C Landfill Leachate (Sites C, D, and E) Treatment System

3. The plant operates in batches as needed, with the amount of ground water to treat depending upon local hydrologic conditions. The design flow of the plant is 3,000 gpd (0.003 MGD). The plant was operating at the time of the inspection.

4. The plant was found in overall satisfactory condition. Plant equipment was found reasonably clean and operational. Outfall 001 appeared to be of satisfactory visual quality.

RCRA D Landfill Leachate Treatment (Site B)

5. An inspection of the leachate pond and storm pond noted that the pump is affixed to a floating dock tethered to the shore. Mr. Roskovics offered as an explanation for the noncompliance for total suspended solids that, in periods of low flow, the pump may come into contact with the muck at the bottom of the pond. The pump was not operating at the time of the inspection due to low flow. RES will have to investigate measures to ensure that the pump does not come into contact with the muck in the bottom of the pond, perhaps by placing the pump on a pole or constructing a sump for the pump, which will require a PTI.

6. According to Mr. Roskovics, this waste stream is not fully treated as presumed by Ohio EPA. Leachate undergoes preliminary settling only in the leachate pond and storm pond areas, where it is then pumped to the final tank in the MFU building just prior to Outfall 604. This waste stream must undergo the same treatment processes as hazardous/nonhazardous liquid waste treatment system.

Plant Sanitary Wastes Treatment System

7. The design flow of the extended aeration plant is 5,700 gpd. The aeration tank contents had a light brown colored sludge that is well aerated with no foaming. The plant was observed in acceptable working order.

8. The wastewater plant had high vegetative growth that surrounds the tanks, and a hornet nest was located in some of the electrical equipment. Grasses surrounding treatment components should be maintained at a reasonable height as to not allow seeds and vegetation to fall into tanks and sand filters. The area should be mowed and trimmed to prevent this from occurring.

9. A log book of repairs and observations is maintained at the WWTP. Mr. Roskovics performs routine operations at the WWTP and monitors the facility. Ms. Specht submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Plant personnel perform daily sampling and operations at the WWTP.

10. The clarifier was observed in acceptable working order, with a small amount of scum. The skimmer and return sludge lines were observed in operational condition. Sludge is removed from the system periodically.

11. The slow sand filter dosing station pumps were cycled and found in operating condition. The plant was not discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. The sand filters were raked and reasonably free of any debris.

12. The chlorine contact tank was found to be stocked with chemicals and aerating the wastewater prior to dechlorination.

13. The final discharge to the ditch north of the Outfall 003 pond was found to be discharging of satisfactory visual quality.

Storm Water Treatment

14. The aerator for the sedimentation basin for Outfall 003 was observed to be in operation at the time of the inspection. The pond was surrounded by dense phragmites.

15. Outfall 003 could not be observed due to the fact that there is a dense phragmite growth and the outfall was submerged.

16. The sedimentation pond for Outfall 004 was observed to have accumulated a significant amount of silt, forming an island in the middle of the pond.

17. Outfall 004 could not be observed due to the fact that there is a dense phragmite growth and the outfall was submerged.

18. Outfall 005 north of Lagoons 3-6 could not be observed due to the fact that there is a dense phragmite growth and the outfall was submerged.

19. Outfall 007 north of Outfall 001 was observed as discharging effluent of an acceptable visual quality.

20. An additional area was examined on the RES property to the northwest of Outfall 006, utilized by Koski Construction, parent company of RES, for storage and processing concrete and asphalt for reuse. The area contains no storm water controls and runoff from this area does not go through a permitted discharge.

NPDES Permit Compliance Review

Reserve Environmental Services operates under Permit 3IN00145*GD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2009 through September 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 period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recoverable	30D Conc	12	13.3	6/1/2009
001	01119	Copper, Total Recoverable	30D Qty	0.0001	.00045	6/1/2009
001	01119	Copper, Total Recoverable	1D Qty	0.0002	.00045	6/25/2009
001	01119	Copper, Total Recoverable	30D Conc	12	14.6	7/1/2009
001	01119	Copper, Total Recoverable	30D Qty	0.0001	.00054	7/1/2009
007	00530	Total Suspended Solids	30D Conc	30	37.	7/1/2009
604	50092	Mercury, Total (Low Level)	30D Conc	739	1350.	7/1/2009
006	50092	Mercury, Total (Low Level)	30D Conc	39	1140.	7/1/2009
006	50092	Mercury, Total (Low Level)	30D Qty	0.0001	.00019	7/1/2009
001	01119	Copper, Total Recoverable	1D Qty	0.0002	.00054	7/22/2009
006	50092	Mercury, Total (Low Level)	1D Conc	93	1140.	7/28/2009
604	00530	Total Suspended Solids	30D Conc	31	36.	10/1/2009
604	00530	Total Suspended Solids	1D Conc	60	64.	11/19/2009
604	00530	Total Suspended Solids	30D Conc	31	46.	12/1/2009
604	00530	Total Suspended Solids	30D Qty	6.69	12.2888	12/1/2009
604	50092	Mercury, Total (Low Level)	30D Conc	739	1540.	12/1/2009
604	50092	Mercury, Total (Low Level)	30D Qty	0.0002	.00044	12/1/2009
604	00530	Total Suspended Solids	1D Qty	12.94	16.7479	12/3/2009
604	00530	Total Suspended Solids	1D Qty	12.94	14.3277	12/17/2009
604	00530	Total Suspended Solids	30D Qty	6.69	7.20098	3/1/2010
604	00530	Total Suspended Solids	1D Qty	12.94	14.0887	3/25/2010
604	00530	Total Suspended Solids	30D Qty	6.69	6.94864	4/1/2010
604	00530	Total Suspended Solids	1D Qty	12.94	14.7070	4/14/2010
604	00530	Total Suspended Solids	30D Conc	31	39.25	5/1/2010
604	00530	Total Suspended Solids	30D Qty	6.69	12.5914	5/1/2010
604	00530	Total Suspended Solids	1D Qty	12.94	22.5259	5/20/2010

604	00530	Total Suspended Solids	30D Conc	31	58.75	6/1/2010
604	00530	Total Suspended Solids	30D Qty	6.69	9.92853	6/1/2010
604	00530	Total Suspended Solids	1D Conc	60	78.	6/3/2010
604	00530	Total Suspended Solids	1D Conc	60	62.	6/17/2010

As RES is aware via an August 10, 2010, letter, your facility is in significant noncompliance for suspended solids. A written explanation as to why the exceedence events occurred must be provided, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting frequency violations were noted; however, the following reporting code violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
004	00530	Total Suspended Solids			AF	12/14/2009
004	00400	pH			AF	12/14/2009
004	00056	Flow Rate			AF	12/14/2009
004	00095	Specific Conductance a			AF	12/14/2009
005	00530	Total Suspended Solids			AF	12/14/2009
005	00400	pH			AF	12/14/2009
005	00056	Flow Rate			AF	12/14/2009
005	00095	Specific Conductance a			AF	12/14/2009
004	00530	Total Suspended Solids			AF	12/28/2009
004	00665	Phosphorus, Total (P)			AF	12/28/2009
004	00400	pH			AF	12/28/2009
004	00056	Flow Rate			AF	12/28/2009
004	00095	Specific Conductance a			AF	12/28/2009
005	00530	Total Suspended Solids			AF	12/28/2009
005	00665	Phosphorus, Total (P)			AF	12/28/2009
005	00400	pH			AF	12/28/2009
005	00056	Flow Rate			AF	12/28/2009
005	00095	Specific Conductance a			AF	12/28/2009

A written explanation as to why these events occurred must be provided along with measures to ensure that it is not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing 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

In review, the compliance schedule prescribed in Part I-C of your permit, the following violations are noted:

1. Final Effluent Limit Compliance Report (NPDES Permit Part 1C, Item A): In review of Ohio EPA's files, we were unable to locate any record of a report submitted by RES detailing the actions to be taken to achieve compliance with final effluent limitations. According to the compliance schedule, this report was due to be submitted to Ohio EPA no later than February 1, 2010. Please provide this information as prescribed by your permit.

2. Mixing Zone Study (NPDES Permit Part 1C, Item C): In review of Ohio EPA's files, we were unable to locate any record of a report submitted by RES evaluating the operational and performance status of the multiport diffuser. According to the compliance schedule, this report was due to be submitted to Ohio EPA no later than August 1, 2010. Conversations with your staff indicate that RES has not yet initiated this study. Please provide Ohio EPA with thefollowing:

    a. Name of the consultant(s) who will perform the evaluation and prepare the report on your behalf.

    b. An activity schedule, including when a final report may be completed and submitted to Ohio EPA.

    c. Provide Ohio EPA with at least a two week notice of when field activities will commence so that we may have the opportunity to be present during field activities.

3. Toxicity Reduction Evaluation Progress Report (NPDES Permit Part 1C, Item D3): In review of Ohio EPA's files, we were unable to locate any record of an annual report submitted by RES detailing the progress of the Toxicity Reduction Evaluation (TRE). According to the compliance schedule and Section 3.0 of the October 2009 report titled *Strategy for Implementation of a Toxicity Reduction Evaluation*, this report was due to be submitted to Ohio EPA no later than August 1, 2010. Please provide this information as prescribed by your permit.

Other Violations
The following other violations with your NPDES permit were noted:

1. Maintenance of Treatment Facility in Good Working Order (NPDES Part III, Item 3A): From examination of the microfiltration unit (MFU) building, the support structure supporting tanks and process lines has corroded to a point where Ohio EPA questions the structural integrity of the support structure. This area must be repaired and maintained to ensure that the integrity is maintained. Consideration should be given to corrosion-resistant materials such as fiberglass or stainless steel.

2. Unauthorized Discharges (NPDES Part III, Item 11): Ohio EPA notes the following:

    a. *Solid Waste Landfill (Site B) Leachate Treatment:* RES is discharging effluent from the solid waste landfill (Site B) only to the final mixing tank that provides partial treatment at best prior to discharge through Station 604 and Outfall 006. This is effectively bypassing the majority of the treatment system that other industrial wastes receive that is discharged through Station 604. The solid waste landfill (Site B) leachate must undergo the same treatment as other waste streams, including microstraining, chemical precipitation, neutralization and microfiltration.

b. *Storm Water from Koski Concrete and Asphalt Processing and Storage Area:* During the site visit, Ohio EPA notes that storm water runoff from the Koski concrete and asphalt processing and storage area, located northwest of Station 604 and southwest of Outfall 006, does not receive any type of treatment or pass through any outfall specified in RES's NPDES permit. At a minimum, storm water from this processing and storage area must be intercepted by a perimeter ditch, and flow to a sedimentation pond and other engineered structures before passing through an outfall regulated by the NPDES permit. This will require the submittal of a permit-to-install (PTI) for review by Ohio EPA, and modification of the RES NPDES permit to add necessary outfall(s).

c. *Notification of Noncompliance:* RES is required by its NPDES permit to notify Ohio EPA of noncompliance with effluent limits within 24 hours of discovery. While some instances have been reported, many others have not.

Based upon the above information, Reserve Environmental Services remains in significant noncompliance.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter 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.

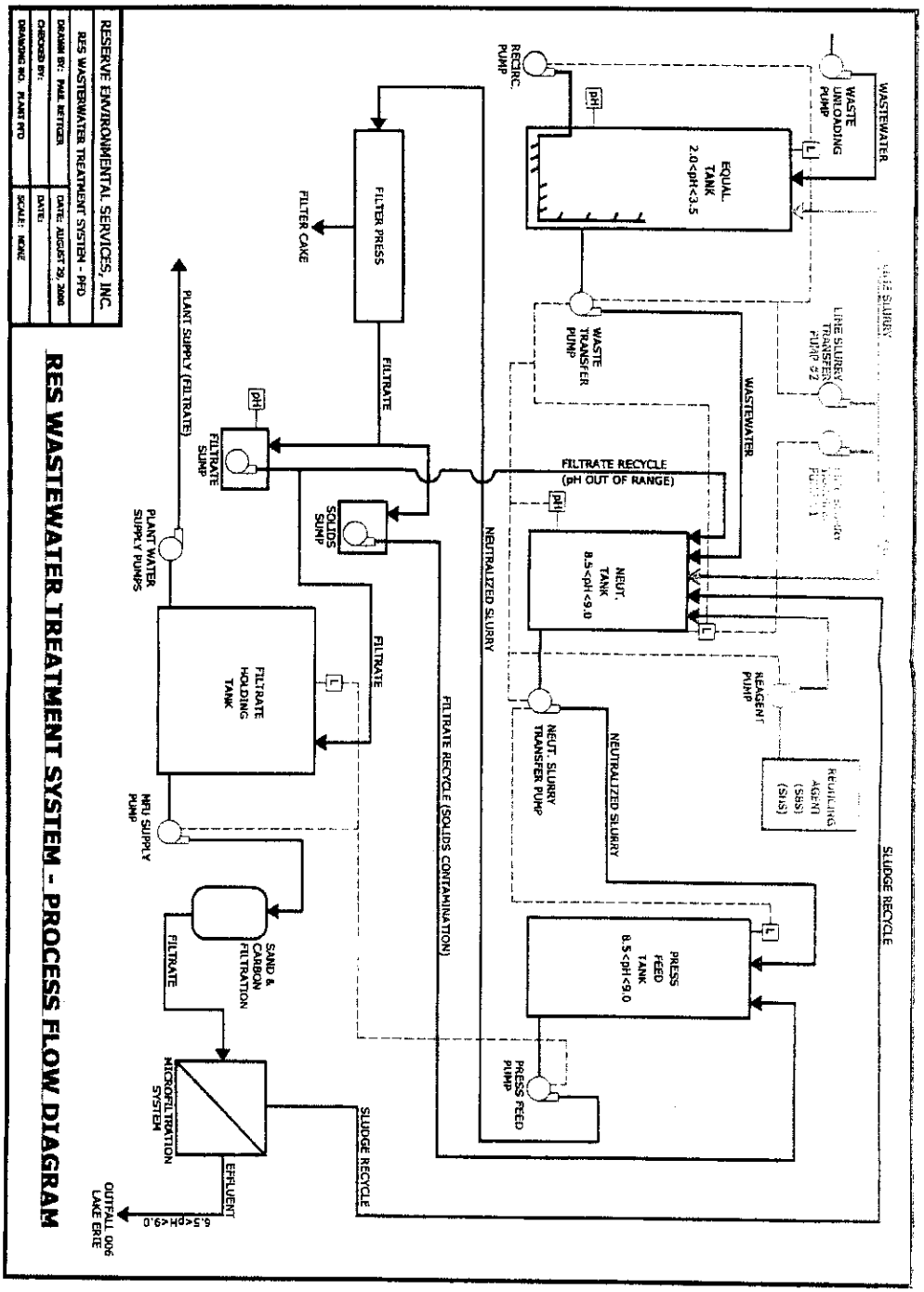
If you have any questions or comments regarding thisinspection, please feel free to contact me at (330) 963-1175.

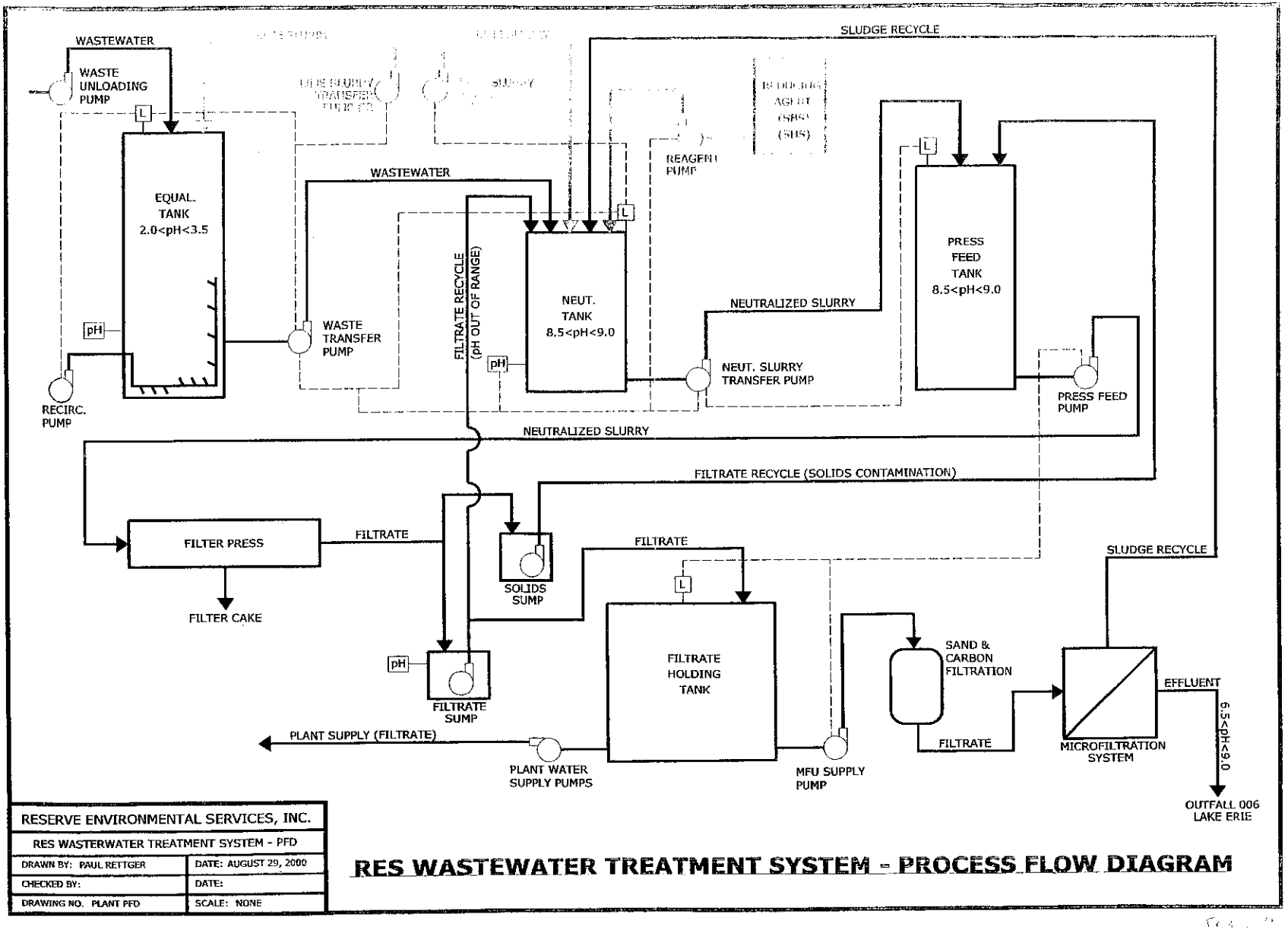
Respectively,

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS:bo

File: Industrial P/C – Reserve Environmental Services


RESERVE ENVIRONMENTAL SERVICES, INC.
RES WASTEWATER TREATMENT SYSTEM - PFD
DRAWN BY: PAUL REITIGER
DATE: AUGUST 29, 2006
CHECKED BY:
DATE:
DRAWING NO. PLANT PFD
SCALE: NONE
RES WASTEWATER TREATMENT SYSTEM - PROCESS FLOW DIAGRAM
WASTEWATER
WASTE UNLOADING PUMP
EQUAL. TANK 2.0<pH<3.5
RECIRC. PUMP
WASTE TRANSFER PUMP
LIME SLURRY TRANSFER PUMP #2
WASTEWATER
FILTRATE RECYCLE (pH OUT OF RANGE)
NEUTRALIZED SLURRY
NEUT. TANK 8.5<pH<9.0
REAGENT PUMP
REAGENT (SBS) (SHS)
NEUT. SLURRY TRANSFER PUMP
NEUTRALIZED SLURRY
SLUDGE RECYCLE
PRESS FEED TANK 8.5<pH<9.0
PRESS FEED PUMP
FILTRATE RECYCLE (SOLIDS CONTAMINATION)
FILTER PRESS
FILTER CAKE
FILTRATE
FILTRATE SUMP
SOLIDS SUMP
PLANT SUPPLY (FILTRATE)
PLANT WATER SUPPLY PUMPS
FILTRATE HOLDING TANK
MFU SUPPLY PUMP
SAND & CARBON FILTRATION
MICROFILTRATION SYSTEM
EFFLUENT
6.5<pH<9.0
OUTFALL 006 LAKE ERIE
SLUDGE RECYCLE



RESERVE ENVIRONMENTAL SERVICES, INC.	
RES WASTERWATER TREATMENT SYSTEM - PFD	
DRAWN BY: PAUL RETTGER	DATE: AUGUST 29, 2000
CHECKED BY:	DATE:
DRAWING NO. PLANT PFD	SCALE: NONE

RES WASTEWATER TREATMENT SYSTEM - PROCESS FLOW DIAGRAM