



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 20, 2011

RE: TRUMBULL COUNTY  
MESOPOTAMIA  
ADVANCE ECO-AGRICULTURE LLC  
NPDES PERMIT NO. OHC000003  
OHIO EPA PERMIT NO. 3GC05200\*AG  
CONSTRUCTION STORM WATER

Mr. John Kempf  
Advanced Eco-Agriculture LLC  
15266 Hayes Road  
Middlefield, OH 44062

Dear Mr. Kempf:

On May 26, 2011, I, along with Chris Moody of the Ohio EPA, performed an inspection at the above-referenced site to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05200\*AG and #3GC05425\*AG. Our records indicate that Advanced Eco-Agriculture LLC was granted coverage under the NPDES permit on December 3, 2010, and April 27, 2011, respectively.

During my inspection, I documented the following deficiencies:

1. Slag leachate is present in the diversion along the driveway (Figure 1). Slag can raise the pH of the water into which it is discharged, causing an impact to water quality. As a result, you must treat the water in a sediment basin and monitor the discharge from the basin to ensure that its pH is in the range of 6.5 to 9. In the event that the pH is outside of this range, the discharge must be terminated until the pH falls within the acceptable range.
2. Oil is visible in the storm water on site (Figure 2). Non-sediment pollutants such as oil must be managed appropriately and disposed of properly to prevent the discharge of pollutants to surface waters of the State.
3. It appears that concrete washout is uncontained (Figure 3). According to the NPDES permit, you must designate contained areas for concrete washout, and these locations must be outlined in your Storm Water Pollution Prevention Plan (SWP3).
4. No inlet protection is present on the storm drain next to the manufacturing building (Figure 4), and sediment-laden water is visible in the catch basin (Figure 5). As stated in the NPDES permit, control practices must be utilized to minimize the amount of sediment that enters storm drains.

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5. Silt fence is not installed properly or is not used at all. The geotextile fabric is not properly attached to its supporting posts (Figures 6 and 7). In many disturbed areas, silt fence is missing (Figures 8 and 9). Please install silt fence where appropriate.
6. The sediment-laden runoff from the site is not currently being treated by an appropriate sediment control, such as a sediment basin. If the SWP3 for the site specifies such a control practice, you must install this device in accordance with the plan. Otherwise, the SWP3 must be updated to include a sediment control that will treat the runoff.
7. It appears that a possible onsite stream and wetlands have been impacted by construction activities (Figures 10 - 13). Please submit a copy of a delineation that was performed on the property as well as any 401/404 permits that may have been issued to the site. In the event that no 401/404 permit has been issued, please contact Ed Wilk, Ohio EPA's 401 Coordinator, to schedule an onsite meeting. For your convenience, Mr. Wilk can be contacted at (330) 963-1172 or via email at [ed.wilk@epa.ohio.gov](mailto:ed.wilk@epa.ohio.gov).

Please submit a copy of the SWP3 for the site, as well as a written report detailing how the above deficiencies will be addressed, to the Ohio EPA within seven days of receiving this letter. The above deficiencies must be addressed within 14 days of receiving this letter. Also, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769.

If you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,



Michelle Hummel  
Assistant to the District Engineer  
Division of Surface Water

MH/mt

cc: Trumbull County SWCD

ec: Ed Wilk, Ohio EPA, NEDO, DSW

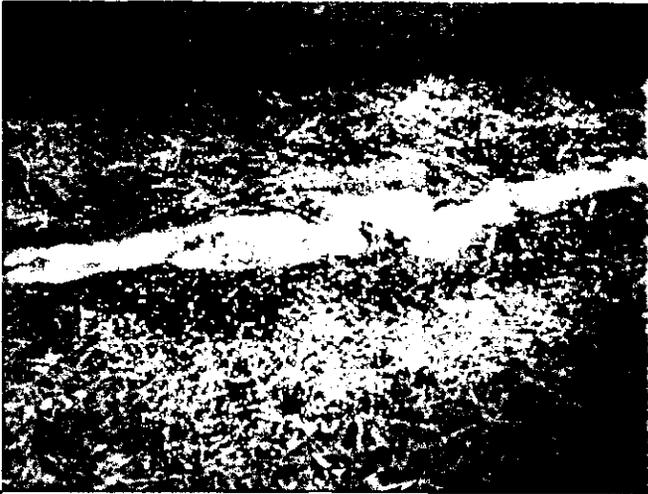


Figure 1 – Slag leachate is present in the diversion beside the driveway.



Figure 2 – Oil is visible in the storm water on site.

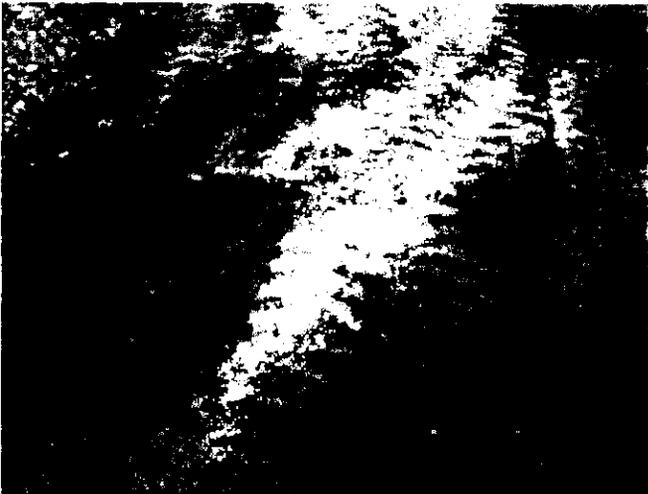


Figure 3 – Concrete washout is not contained within a designated area.

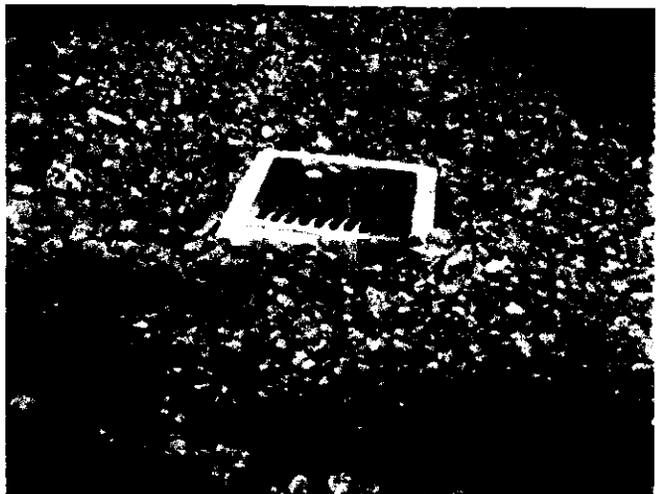


Figure 4 – No inlet protection is present.



Figure 5 – Sediment-laden water can be seen in the catch basin, which discharges to waterways.



Figure 6 – The silt fence fabric is not properly attached to its supporting posts.



Figure 7 – The silt fence is not preventing sediment from leaving the disturbed area.



Figure 8 – No silt fence is present at the boundary of the disturbed area.



Figure 9 – No silt fence is present at the boundary of the disturbed area.



Figure 10 – Pollutants and sediment are present in the diversion leading to a possible stream.



Figure 11 – Polluted and sediment-laden water is entering a possible stream.



Figure 12 – Sediment-laden water is entering a possible wetland.



Figure 13 – Fill is present in what appears to be a wetland.