

**Environmental
Protection Agency**

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

September 1, 2010

RE: KING LUMINAIRE JEFFERSON PLANT
OHIO EPA PERMIT 3PR00324
JEFFERSON TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. David Loofboro, Plant Manager
King Luminaire, Company, Inc.
1153 State Route 46 North
Jefferson, OH 44047

Dear Mr. Loofboro:

On August 10, 2010, a site inspection was conducted at the above referenced facility at 1153 State Route 46 North, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, you represented King Luminaire Company, Inc., and Dustin Lewis and Marlene Knopsnider represented Lewis Wastewater Management, Inc., your plant operators, 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, and to follow up on an August 10, 2008 site visit. The last compliance inspection was conducted on July 8, 2008.

There are no floor drains within the manufacturing building. No industrial process waste water is discharged to the waste water treatment system. The sole source of the wastewater flow is domestic sewage from employee restrooms.

Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility. Storm water is diverted to ditches around the perimeter of the facility. There is no storm water pond. A significant amount of materials are stored outside exposed to the elements (see attached picture). You informed me that King Luminaire has a design for a new warehouse which will house this material, to be constructed in the fall of 2010.

Plant Sanitary Waste Water Treatment

The plant receives plant sanitary wastes. The system consists of a trash trap, flow equalization, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publically owned treatment works (POTW). The plant effluent discharges to an unnamed tributary to Griggs Creek located adjacent to the west side of the plant. 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 plant was found in acceptable condition, an improvement over the August 10, 2010 inspection. The area around the plant has been mowed, and signage installed to identify the final outfall.
2. The design flow of the extended aeration plant is 1,750 gallons per day. The aeration tank contents were a chocolate brown color and had a faint earthy odor that is well aerated with no foaming. This is an indication of a properly operating system. You indicated that the plant had been reseeded.
3. A log book of repairs and observations is maintained at the WWTP. Marlene Knopsnider of Lewis Wastewater Management, performs routine operations at the WWTP, monitors the facility, and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Plant personnel perform daily inspections of the plant and notify Lewis if there is a problem.
4. Clarifiers were observed clear. The skimmer and return sludge lines were observed in operational condition. Effluent weirs were noted as reasonably clean and free of debris, an improvement over the August 10, 2010 inspection.
5. The slow sand filter dosing station pumps were cycled and found in operating condition. The plant was discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. New sand appears to have been added to the filters. Both filters were found as free of vegetation and sludge, recently raked and reasonably clean, an improvement over the August 10, 2010 inspection.
6. The chlorine contact tank was found stocked with appropriate chemicals and was providing disinfection for the facility. The dechlorination system was also found stocked with chemicals and was providing dechlorination for the facility. The condition of the chlorination and dechlorination systems was found markedly improved over the August 10, 2010 inspection.
7. The final discharge was found discharging an effluent of satisfactory visual quality, clean and clear with no noticeable odor. Signage of the location of the discharge was located as prescribed by your NPDES permit.

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NPDES Permit Compliance Review

King Luminaire operates under Permit 3PR00324*BD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2008 through August 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	50060	Chlorine, Total Residu	1D Conc	0.019	19.	6/22/2010
001	00610	Nitrogen, Ammonia (NH3	30DConc	3.0	6.44	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	6.44	12/8/2008

A written explanation as to why these exceedence events occurred must be provided, along with measures to ensure that they are not repeated.

Reporting Violations

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

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	8/14/2008

A written explanation as to why this event 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 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

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

Failure to apply for an Industrial Discharge Permit – During both the August 10, 2010 and August 31, 2010 inspections, Ohio EPA noted a significant accumulation of finished

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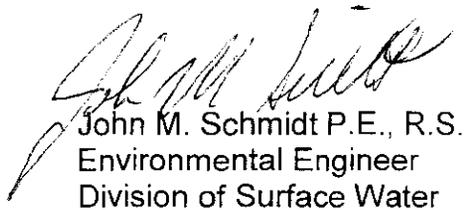
product stored outside exposed to the elements. During the inspection you indicated that it is King Luminaire's intention to construct a warehouse and that this material will be moved under roof. Materials cannot be permitted to be stored outside exposed to the elements. Materials kept outside must be tarped. **King Luminaire must either construct the warehouse and move materials under roof no later than December 30, 2010 or apply for an industrial NPDES permit. Please provide a schedule for construction and completion of the warehouse.**

Based upon the following information, King Luminaire is considered in substantial compliance with the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. However, the above items must be addressed.

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 this inspection, please feel free to contact me at (330) 963-1175.

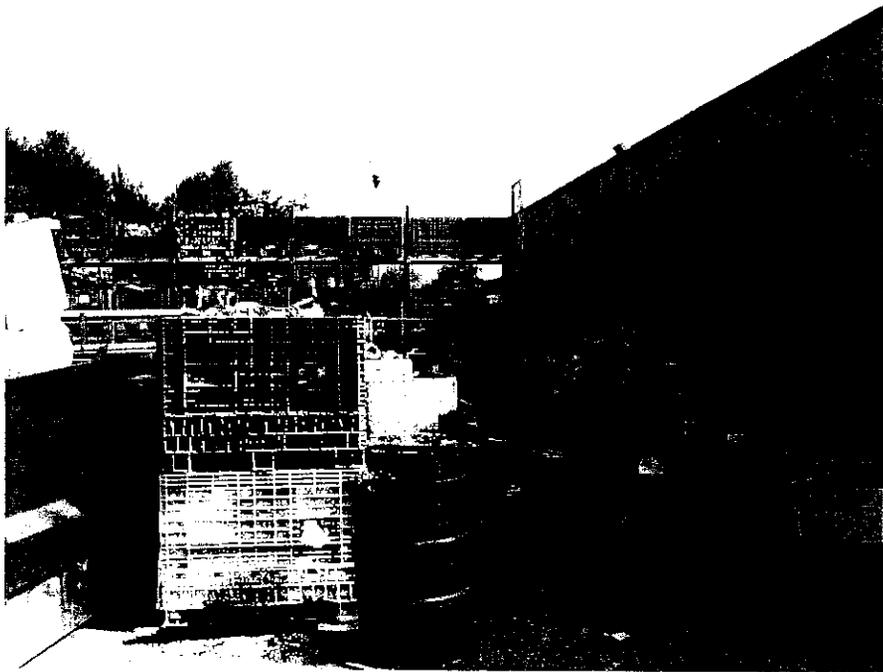
Respectively,



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

JMS/mt

File: SP/Ashtabula/Jefferson Twp/King Luminaire Company, Inc.



Outside Material Storage Areas Pic 1



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