

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

October 25, 2011

RE: RESERVE ENVIRONMENTAL SERVICES
NPDES PERMIT No. 3IN00145
ASHTABULA TWP., ASHTABULA CO.
NOTICE OF VIOLATION
CERTIFIED MAIL

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

Dear Mr. Chokshi:

During a review of Ohio EPA's electronic discharge monitoring report (eDMR) information for the above referenced facility at 4633 Middle Road, Ashtabula Township, Ashtabula County, Ohio EPA notes that the facility is in significant noncompliance (SNC) for total dissolved solids, total suspended solids and mercury. U.S. EPA defines significant noncompliance for total suspended solids and total residual solids if a facility exceeds the limits established by the facility's National Pollutant Discharge Elimination System (NPDES) permit by more than 40% for two or more months during the consecutive quarter review. U.S. EPA defines significant noncompliance for mercury if a facility exceeds the limits established by the facility's National Pollutant Discharge Elimination System (NPDES) permit by more than 20% for two or more months during the consecutive quarter review. The review period reviewed is April 2011 through September 2011.

A review of the eDMR information for these parameters indicated the following exceedences:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
006	00515	Residue, Total Dissolved	30D Qty	7704	11633.8	4/1/2011
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	3.99	4/1/2011
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000		4/1/2011
604	00530	Total Suspended Solids	30D Qty	6.69	11.6713	4/1/2011
604	00530	Total Suspended Solids	1D Qty	12.94	16.4408	4/7/2011
604	00530	Total Suspended Solids	1D Qty	12.94	22.6104	4/27/2011
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	3.14	5/1/2011
006	00515	Residue, Total Dissolved	30D Qty	7704	11171.7	5/1/2011
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	58.1	5/1/2011
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00002	5/1/2011
604	00530	Total Suspended Solids	30D Conc	31	53.75	5/1/2011
604	00530	Total Suspended Solids	30D Qty	6.69	24.2835	5/1/2011
604	00530	Total Suspended Solids	1D Qty	12.94	35.2023	5/12/2011
604	00530	Total Suspended Solids	1D Conc	60	118	5/26/2011
604	00530	Total Suspended Solids	1D Qty	12.94	46.5745	5/26/2011
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	84.6	6/1/2011
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00003	6/1/2011
604	00530	Total Suspended Solids	30D Conc	31	36.75	6/1/2011

MR. YOGI CHOKSHI, RESERVE ENVIRONMENTAL SERVICES, INC.
 RESERVE ENVIRONMENTAL SERVICES WWTP
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604	00530	Total Suspended Solids	30D Qty	6.69	10.6343	6/1/2011
604	00530	Total Suspended Solids	1D Conc	60	69	6/23/2011
604	00530	Total Suspended Solids	1D Qty	12.94	22.5333	6/23/2011
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	20.5	7/1/2011
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.0.00001	7/1/2011
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	9.51	8/1/2011
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.0.00001	8/1/2011
604	00530	Total Suspended Solids	30D Conc	31	38.5	9/1/2011

The following milestones have been missed in your NPDES permit, and are also considered significant noncompliance issues:

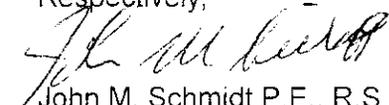
Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
8/1/2009	7/31/2013	2/1/2010	Not Completed	----	Other	Final Effluent Compl Report
8/1/2009	7/31/2013	8/1/2010	Not Completed	----	Other	Mixing Zone Study
8/1/2009	7/31/2013	8/1/2010	Not Completed	----	Other	TRE Progress Report

Ohio EPA understands that RES is aware of these violations and has responded to letters from both Ohio EPA and U.S. EPA concerning these violations and milestones. Ohio EPA further understands that a mercury variance application is pending with the agency. Please provide an update as to when Ohio EPA can expect a permit-to-install (PTI) for necessary plant improvements, plans for making final Outfalls accessible, and these milestones to be completed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that have been or will be taken to correct the above noncompliance. If you determine that additional treatment units are necessary in order to achieve compliance, please note that you must submit a PTI application, along with the necessary application forms, associated fees, and detailed plans and specifications to this office for review. 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 notification, 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/cs

Jonathan Moody, U.S. EPA Region V
 Paul Novak, Ohio EPA, DSW, CO
 File: Industrial/Reserve Environmental Services WWTP/PC

10/25/11



7008 3230 0003 5419 5958

Environmental Protection Agency



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

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

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
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8565 6745 E000 0E2E 8002

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>x Donald R. Koski</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) RONALD R. KOSKI</p> <p>C. Date of Delivery 10.26.11</p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: PO Box 1038 Ashtabula OH 44005</p>
1. Article Addressed to:	3. Service Type
MR. YOGI CHOKSHI, PRESIDENT RESERVE ENVIRONMENTAL SERVICES, INC. 4633 MIDDLE ROAD ASHTABULA, OH 44004	<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
2. Article Number (Transfer from service label) 7008 3230 0003 5419 5958	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
Schmidt 10/25/11	