

**Environmental  
Protection Agency**

Ohio Department of Environmental Protection  
190 East Broad Street  
Columbus, Ohio 43260-1524  
614.644.6300  
www.epa.ohio.gov  
Governor  
Lt. Governor  
Director

October 19, 2011

RE: ODOT ROM EMAINTENENCE OUTPOST  
NPDES PERMIT NO. 3PP00044  
ROME TWP., ASHTABULA COUNTY

**NOTICE OF VIOLATION**

**CERTIFIED MAIL**

Mr. Thomas Wathen  
Head of Building Maintenance  
Ohio Department of Transportation  
2088 S. Arlington Rd.  
Akron, Ohio 44306

Dear Mr. Wathen:

During a review of Ohio EPA's electronic Discharge Monitoring Report (eDMR) information for the above referenced facility at 5451 State Route 45, Rome Township, Ashtabula County, Ohio EPA notes that the facility is in Significant Noncompliance (SNC) for chlorine residual. U.S. EPA defines significant noncompliance for chlorine residual 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. The review period reviewed is April 2011 through August 2011.

A review of the eDMR information for bacteria indicated the following exceedences:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	3.6	6/2/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	2.2	8/10/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	2.2	8/17/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	1.1	8/29/2011

Ohio EPA understands that you have been working with our technical assistance unit for a resolution to this issue. A written explanation as to why the events occurred, along with measures to ensure that they will not be repeated must be provided.

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. 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.

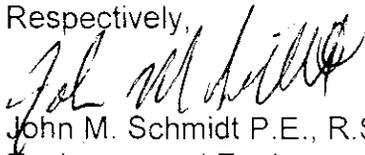
If you determine that additional treatment units are necessary in order to achieve compliance, please note that you must submit a Permit-to-Install (PTI) application, along

MR. THOMAS WATHEN, OHIO DEPARTMENT OF TRANSPORTATION  
ODOT ROME MAINTENANCE OUTPOST WWTP  
OCTOBER 19, 2011  
PAGE 2 OF 2

with the necessary application forms, associated fees, and detailed plans and specifications to this office for review. Additional information on the PTI process may be found at <http://epa.ohio.gov/dsw/pti/index.aspx>. Application forms may be found at <http://epa.ohio.gov/dsw/pti/PTIForms.aspx>.

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

File: Semipublic/Ashtabula/Rome Twp./ODOT Rome Maintenance Outpost 3PP00044)

7008 3230 0003 5419 6238

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
For delivery information, visit our web site at <a href="http://www.usps.com">www.usps.com</a>	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent to

Street, Apt. No.,  
or PO Box No.

City, State, ZIP+4

**Environmental  
Protection Agency**

Director  
Lt. Governor  
Governor

October 5, 2011

RE: MAHONING COUNTY  
LOWELLVILLE  
ALUMINUM COLOR INDUSTRIES, INC.  
PERMIT NO. 3DP00001\*EP  
INDUSTRIAL USER INSPECTION

Ms. Tina Spinosa  
Aluminum Color Industries, Inc.  
369 West Wood Street  
Lowellville, OH 44436

Dear Ms. Spinosa:

On September 21, 2011, this office conducted an Industrial User inspection of the above facility. Ryan Laake and Donna Kniss represented the Ohio Environmental Protection Agency (EPA), and you represented the company. Aluminum Color Industries, Inc. (ACI) discharges to the Village of Lowellville Wastewater Treatment Plant (WWTP) and has been issued Indirect Discharge (IDP) Permit NO. 3DP00001\*EP. The purpose of the inspection was to evaluate ACI's compliance with the existing IDP.

ACI fabricates and anodizes aluminum parts. The anodizing process is a sulfuric acid anodizing process, with a nickel sealant. There are approximately 10 employees working one (1) shift per day, five (5) days per week. The anodizing operation is usually run one (1) day per week. Anodizing is run predominately at night. The anodizing line rinses overflow during operations, and the tanks are drained after every five (5) days of production. There are three (3) holding tanks for soap, nickel, and acid. Nickel and acid solutions are bled into the treatment system, and soap solution is bled into the sewer. The last time the soap was bled into the sewer was about two (2) years ago.

ACI has a pretreatment system that operates after the anodizing line is started. Wastewater flows into pits and is then pumped into the treatment system, where acid or caustic is added to a target pH of 7.5 and coagulant is added. Scrubber water is also routed into a pit and through the treatment system. The water then flows through a polymer addition flocc tank and into two (2) inclined plate clarifiers. The clarifier overflow is routed to the "City tank T". Downstream of the City tank there are treatment pits that were installed for additional treatment such as pH adjustment, but no additional treatment occurs. Sludge from the clarifiers is pumped into tank "O", and is dewatered in a plate and frame filter press.

Laboratory analyses are conducted by Cardinal Laboratories. A grab sample is collected from the last pit before discharge. The samples are collected by ACI employees in bottles provided by Cardinal. The sample is refrigerated after collection, and a Cardinal Labs representative usually picks up the samples the day after collection. The reported pH is from the mixer pit when the sample is taken. A review of the chain-of-custody forms showed that they were generally completed correctly. Flow is estimated based on the water used in the production processes.

## Aluminum Color

Data June 2005 through June 2011

### Limit Violations

Permit No	Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3DP00001*EP		100	Nickel, Total Recovera	1D Conc	3980	4180.	11/23/2010
3DP00001*EP		100	Nickel, Total Recovera	30D Conc	2380	4180.	11/1/2010

### Frequency Violations

Permit No	Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
3DP00001*EP	June 2008	100	Total Toxic Organics	2/Year	1	0	06/01/2008
3DP00001*EP	April 2009	100	Nickel, Total Recovera	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Cyanide, Total	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Chromium, Total (Cr)	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Copper, Total (Cu)	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Lead, Total (Pb)	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Zinc, Total (Zn)	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Flow Rate	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Cadmium, Total (Cd)	1/Month	1	0	04/01/2009
3DP00001*EP	April 2009	100	Silver, Total (Ag)	1/Month	1	0	04/01/2009
3DP00001*EP	January 2009	100	Total Toxic Organics	1/6Months	1	0	01/01/2009
3DP00001*EP	April 2009	100	pH, Minimum	1/Month	1	0	04/01/2009
3DP00001*EP	January 2010	100	Total Toxic Organics	1/6Months	1	0	01/01/2010
3DP00001*EP	July 2010	100	Total Toxic Organics	1/6Months	1	0	07/01/2010
3DP00001*EP	May 2011	100	Nickel, Total Recovera	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Cyanide, Total	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Chromium, Total (Cr)	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Copper, Total (Cu)	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Lead, Total (Pb)	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Zinc, Total (Zn)	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Flow Rate	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Cadmium, Total (Cd)	1/Month	1	0	05/01/2011
3DP00001*EP	May 2011	100	Silver, Total (Ag)	1/Month	1	0	05/01/2011
3DP00001*EP	January 2011	100	Total Toxic Organics	1/6Months	1	0	01/01/2011
3DP00001*EP	May 2011	100	pH, Minimum	1/Month	1	0	05/01/2011

MAHONING COUNTY  
ALUMINUM COLOR INDUSTRIES, INC.  
OCTOBER 5, 2011  
PAGE 2 OF 2

A review of the IDP monitoring data from June 2005 to July 2011 showed one (1) permit violation in November 2010 for exceeding the nickel concentration limit. The nickel concentration was well below permit limits in December 2010. There were frequency violations in April 2009 and May 2010. A copy of the violation data is attached.

The Aluminum Color IDP expired March 31, 2010, and we could not locate a renewal application. During the inspection, you indicated that you thought you had filed the renewal application, and would review your records. In order to satisfy the outstanding compliance issues, please provide the following to this office:

1. A completed IDP application with the appropriate fee. If the application was previously filed, please provide a copy of that application and documentation, such as a cancelled check, showing that the renewal fee was paid.
2. Documentation that spill/slug areas were investigated and a spill prevention and slug discharge control plan has been developed.
3. Documentation that an operation and maintenance manual for the pretreatment system has been developed.
4. Documentation that an operations log, including pH meter calibration, has been developed. Please send a copy of a completed log page with this documentation.

If you have any questions or comments, please contact me at (330)963-1285. I can also be reached via e-mail at [donna.kniss@epa.state.oh.us](mailto:donna.kniss@epa.state.oh.us).

Sincerely,



Donna J. Kniss  
Environmental Engineer  
Division of Surface Water

DJK/cs  
attachment

cc Mayor and Council  
Rich DeLuca  
Ryan Laake, Ohio EPA, CO,DSW

Ec ✓ John Kwolek, Ohio EPA, NEDO, DSW

File: Pretreatment Industrial User/Permit-Compliance