



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 11, 2007

Re: Tuscarawas County
Dover Chemical Corporation
Notice of Violation
OIF00040, OH0007269
Correspondence (IWW/Major)

Mr. W. Patrick Huth, EH&S Manager
Dover Chemical Corporation
3676 Davis Road N.W.
P.O. Box 40
Dover, Ohio 44622

Dear Mr. Huth:

We have received your self-monitoring reports covering the months of June 2004 through July 2007 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Outfall	Date	Parameter	Reported	Units	Permit Limitation
June 2004:					
002	6/15-6/21	Chlorine Residual	1/week	mg/l	Monitoring required 2/week
July 2004:					
002	6 Days	pH, Maximum	9.1-10.2	S.U.	9.0 Maximum
002	2 Days	pH, Minimum	5.7-6.2	S.U.	6.5 Minimum
602	Average	Suspended Solids	23	mg/l	12
602	Average	Suspended Solids	0.030	kg/day	0.016
602	7/12	Suspended Solids	23	mg/l	18
602	7/12	Suspended Solids	0.030	kg/day	0.024
August 2004:					
602	8/16	Chlorine Residual	0.8	mg/l	0.5
September 2004:					
002	9/1	2,3,7,8-TCDD	0.013	pg/l	0.0023
602	9/7	Chlorine Residual	4.2	mg/l	0.5
October 2004:					
002	Average	2,3,7,8-TCDD	AH	pg/l	Monitoring required 1/month
002	Average	Chlorinated Hydrocarbons	AH	ug/l	Monitoring required 1/month
002	Average	Manganese, Total Recoverable	AH	ug/l	Monitoring required 1/month
002	Average	PCB's	AH	ug/l	Monitoring required 1/month
002	Average	Toxicity Equivalent	AH	pg/l	Monitoring required 1/month
002	Average	Chlorine Residual	0.05	mg/l	0.022
002	Average	Chlorine Residual	0.83	kg/day	0.33

Outfall	Date	Parameter	Reported	Units	Permit Limitation
002	10/13 & 10/27	Chlorine Residual	0.2	mg/l	0.029
002	10/13 & 10/27	Chlorine Residual	3.01 & 3.59	kg/day	0.44
602	10/4	Chlorine Residual	0.9	mg/l	0.5
November 2004:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	11/3	Chlorine Residual	0.2	mg/l	0.029
002	11/3	Chlorine Residual	2.64	kg/day	0.44
January 2005:					
002	Average	Chlorine Residual	0.063	mg/l	0.022
002	Average	Chlorine Residual	0.95	kg/day	0.33
002	1/3&1/5	Chlorine Residual	0.2-0.3	mg/l	0.029
002	1/3&1/5	Chlorine Residual	3.07-4.54	kg/day	0.44
002	4 Days	pH, Maximum	10.4-13.9	S.U.	9.0 Maximum
February 2005:					
002	2/1	pH, Maximum	AD	S.U.	Monitoring required 1/day
002	2/1	pH, Minimum	AD	S.U.	Monitoring required 1/day
April 2005:					
002	4/21	pH, Maximum	AD	S.U.	Monitoring required 1/day
002	4/21	pH, Minimum	AD	S.U.	Monitoring required 1/day
602	Average	CBOD ₅	22	mg/l	10
602	Average	CBOD ₅	0.029	kg/day	0.013
602	Average	Suspended Solids	21	mg/l	12
602	Average	Suspended Solids	0.028	kg/day	0.016
602	4/4	Suspended Solids	21	mg/l	18
602	4/4	Suspended Solids	0.028	kg/day	0.024
602	4/4	CBOD ₅	22	mg/l	15
602	4/4	CBOD ₅	0.029	kg/day	0.020
May 2005:					
602	Average	Fecal Coliform	5200	#/100ml	1000
602	5/2	Fecal Coliform	5200	#/100ml	2000
June 2005:					
002	6/23&6/24	pH, Maximum	AD	S.U.	Monitoring required 1/day
002	6/23&6/24	pH, Minimum	AD	S.U.	Monitoring required 1/day
602	Average	Suspended Solids	14	mg/l	12
602	Average	Suspended Solids	0.019	kg/day	0.016
602	6/6	Suspended Solids	23	mg/l	18
602	6/6	Suspended Solids	0.030	kg/day	0.024
602	Average	Fecal Coliform	8800	#/100ml	1000
602	6/13	Fecal Coliform	8800	#/100ml	2000
July 2005:					
002	7/28	pH, Maximum	9.4	S.U.	9.0 Maximum
002	7/28	pH, Minimum	3.4	S.U.	6.5 Minimum
002	Average	Gamma-BHC, Total	0.021	ug/l	0.02

Outfall	Date	Parameter	Reported	Units	Permit Limitation
602	7/11&7/20	Chlorine Residual	1.6-8.3	mg/l	0.5
August 2005:					
002	8/15	pH, Minimum	3.8	S.U.	6.5 Minimum
September 2005:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.38	kg/day	0.33
002	9/14	Chlorine Residual	0.2	mg/l	0.029
002	9/14	Chlorine Residual	3.01	kg/day	0.44
602	9/6&9/19	Chlorine Residual	0.7-4.6	mg/l	0.5
October 2005:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.38	kg/day	0.33
002	10/12	Chlorine Residual	0.2	mg/l	0.029
002	10/12	Chlorine Residual	3.05	kg/day	0.44
602	Average	Suspended Solids	14	mg/l	12
602	Average	Suspended Solids	0.019	kg/day	0.016
602	Average	Fecal Coliform	5200	#/100ml	1000
602	10/3	Fecal Coliform	5200	#/100ml	2000
November 2005:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.39	kg/day	0.33
002	11/28	Chlorine Residual	0.2	mg/l	0.029
002	11/28	Chlorine Residual	3.11	kg/day	0.44
002	Average	Gamma-BHC, Total	0.58	ug/l	0.02
002	Average	Gamma-BHC, Total	0.0092	kg/day	0.0003
002	11/9	Oil and Grease	19.3	mg/l	10
002	11/9	Oil and Grease	303	kg/day	151
002	11/14 & 11/16	Carbon Tetrachloride	181-220	ug/l	50
002	11/14 & 11/16	Carbon Tetrachloride	2.88-3.54	kg/day	0.76
002	11/14 & 11/16	Chloroform	127-149	ug/l	75
002	11/14 & 11/16	Chloroform	2.02-2.40	kg/day	1.14
602	Average	CBOD ₅	14	mg/l	10
602	Average	CBOD ₅	0.019	kg/day	0.013
December 2005:					
002	12/28	Chloroform	89	ug/l	75
002	12/28	Chloroform	1.28	kg/day	1.14
602	Average	Suspended Solids	13	mg/l	12
602	Average	Suspended Solids	0.017	kg/day	0.016
602	12/5	Suspended Solids	26	mg/l	18
602	12/5	Suspended Solids	0.034	kg/day	0.024
January 2006:					
002	Average	Chlorine Residual	0.05	mg/l	0.022

Outfall	Date	Parameter	Reported	Units	Permit Limitation
002	Average	Chlorine Residual	0.77	kg/day	0.33
002	1/11&1/23	Chlorine Residual	0.2	mg/l	0.029
002	1/11&1/23	Chlorine Residual	3.01-3.18	kg/day	0.44
February 2006:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.39	kg/day	0.33
002	2/6	Chlorine Residual	0.2	mg/l	0.029
002	2/6	Chlorine Residual	3.15	kg/day	0.44
March 2006:					
002	3/17	Carbon Tetrachloride	70	ug/l	50
002	3/17	Carbon Tetrachloride	1.01	kg/day	0.76
May 2006:					
002	Average	2,3,7,8-TCDD	AH	pg/l	Monitoring required 1/month
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.38	kg/day	0.33
002	5/10	Chlorine Residual	0.2	mg/l	0.029
002	5/10	Chlorine Residual	3.04	kg/day	0.44
602	5/15-5/28	Chlorine Residual	None	mg/l	Monitoring required 1/2weeks
June 2006:					
602	6/15-6/28	Chlorine Residual	None	mg/l	Monitoring required 1/2weeks
July 2006:					
002	Weeks 1-4	1,1,1-Trichloroethane	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	1,2,4-Trichlorobenzene	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	1,2-Dichlorobenzene	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	1,3-Dichlorobenzene	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	1,4-Dichlorobenzene	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	Carbon Tetrachloride	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	Chlorobenzene	AE	ug/l	Monitoring required 2/week
002	Weeks 1-4	Chloroform	AE	ug/l	Monitoring required 2/week
002	Average	Gamma-BHC, Total	0.023	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00035	kg/day	0.0003
August 2006:					
002	Average	Gamma-BHC, Total	0.031	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00048	kg/day	0.0003
002	8/2	Chloroform	130	ug/l	75
002	8/2	Chloroform	2.02	kg/day	1.14
602	Average	Suspended Solids	19	mg/l	12
602	Average	Suspended Solids	0.025	kg/day	0.016
602	8/7	Suspended Solids	19	mg/l	18
602	8/7	Suspended Solids	0.025	kg/day	0.024
602	Average	Fecal Coliform	480000	#/100ml	1000
602	8/14	Fecal Coliform	480000	#/100ml	2000
September 2006:					
002	Average	Gamma-BHC, Total	0.030	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00041	kg/day	0.0003

Outfall	Date	Parameter	Reported	Units	Permit Limitation
002	Average	Chloroform	1023	ug/l	50
002	Average	Chloroform	12.1	kg/day	0.76
002	8 Days	Chloroform	76-9700	ug/l	75
002	7 Days	Chloroform	1.16-112	kg/day	1.14
002	7 Days	Carbon Tetrachloride	52-670	ug/l	50
002	5 Days	Carbon Tetrachloride	0.85-7.71	kg/day	0.76
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.34	kg/day	0.33
002	9/13	Chlorine Residual	0.2	mg/l	0.029
002	9/13	Chlorine Residual	2.71	kg/day	0.44
October 2006:					
002	Average	Gamma-BHC, Total	0.027	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00036	kg/day	0.0003
002	10/2&10/4	Carbon Tetrachloride	52-63	ug/l	50
002	10/4	Carbon Tetrachloride	0.83	kg/day	0.76
002	10/2	Chloroform	140	ug/l	75
002	10/2	Chloroform	1.96	kg/day	1.14
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.35	kg/day	0.33
002	10/23	Chlorine Residual	0.2	mg/l	0.029
002	10/23	Chlorine Residual	2.79	kg/day	0.44
November 2006:					
002	Average	Gamma-BHC, Total	0.023	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00033	kg/day	0.0003
December 2006:					
002	Average	Gamma-BHC, Total	0.027	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00038	kg/day	0.0003
002	Average	Chlorine Residual	0.075	mg/l	0.022
002	Average	Chlorine Residual	0.90	kg/day	0.33
002	12/11,12/26 &12/27	Chlorine Residual	0.2	mg/l	0.029
002	12/11,12/26 &12/27	Chlorine Residual	1.84-3.04	kg/day	0.44
January 2007:					
002	Average	Gamma-BHC, Total	0.046	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00066	kg/day	0.0003
002	Average	Chlorine Residual	0.038	mg/l	0.022
002	Average	Chlorine Residual	0.51	kg/day	0.33
002	1/3	Chlorine Residual	0.3	mg/l	0.029
002	1/3	Chlorine Residual	4.04	kg/day	0.44
February 2007:					
002	2/5	Acute Toxicity, Ceriodaphnia dubia	1.1	TU _a	1.0
March 2007:					
002	Average	Chlorine Residual	0.025	mg/l	0.022
002	Average	Chlorine Residual	0.37	kg/day	0.33

Outfall	Date	Parameter	Reported	Units	Permit Limitation
002	3/7	Chlorine Residual	0.2	mg/l	0.029
002	3/7	Chlorine Residual	2.96	kg/day	0.44
April 2007:					
002	Average	Gamma-BHC, Total	0.031	ug/l	0.02
002	Average	Gamma-BHC, Total	0.00047	kg/day	0.0003
002	4/25	Chlorine Residual	0.12	mg/l	0.029
002	4/25	Chlorine Residual	1.86	kg/day	0.44
May 2007:					
002	Average	2,3,7,8-TCDD	AH	pg/l	Monitoring required 1/month
002	Average	Chlorinated Hydrocarbons	AH	ug/l	Monitoring required 1/month
002	Average	Toxicity Equivalent	AH	pg/l	Monitoring required 1/month
002	Average	Chlorine Residual	0.036	mg/l	0.022
002	Average	Chlorine Residual	0.53	kg/day	0.33
002	5/25	Chlorine Residual	0.29	mg/l	0.029
002	5/25	Chlorine Residual	4.24	kg/day	0.44
602	5/1-5/14	Chlorine Residual	None	mg/l	Monitoring required 1/2weeks
801	Quarterly	2,3,7,8-TCDD	AH	pg/l	Monitoring required 1/quarter
801	Quarterly	Chlorinated Hydrocarbons	AH	ug/l	Monitoring required 1/quarter
801	Quarterly	Toxicity Equivalent	AH	pg/l	Monitoring required 1/quarter
801	Quarterly	Chlorinated DiBenzo Furans, Sludge	AH	mg/kg	Monitoring required 1/quarter
801	Quarterly	Chlorinated Dibenzo-P-Dioxins, Sludge	AH	mg/kg	Monitoring required 1/quarter
901	Quarterly	2,3,7,8-TCDD	AH	pg/l	Monitoring required 1/quarter
901	Quarterly	Chlorinated Hydrocarbons	AH	ug/l	Monitoring required 1/quarter
901	Quarterly	Toxicity Equivalent	AH	pg/l	Monitoring required 1/quarter
901	Quarterly	Chlorinated DiBenzo Furans, Sludge	AH	mg/kg	Monitoring required 1/quarter
901	Quarterly	Chlorinated Dibenzo-P-Dioxins, Sludge	AH	mg/kg	Monitoring required 1/quarter
June 2007:					
002	Average	Chlorine Residual	0.061	mg/l	0.022
002	Average	Chlorine Residual	0.93	kg/day	0.33
002	6/4, 6/18, 6/20	Chlorine Residual	0.14-0.2	mg/l	0.029
002	6/4, 6/18, 6/20	Chlorine Residual	1.93-3.29	kg/day	0.44
602	Average	CBOD ₅	23	mg/l	10
602	Average	CBOD ₅	0.030	kg/day	0.013
602	6/22	CBOD ₅	23	mg/l	15
602	6/22	CBOD ₅	0.030	kg/day	0.020
602	Average	Fecal Coliform	92000	#/100ml	1000
602	6/22	Fecal Coliform	92000	#/100ml	2000
July 2007:					
002	7 Days	pH, Minimum	AE	S.U.	Monitoring required 1/day
002	7 Days	pH, Maximum	AE	S.U.	Monitoring required 1/day
002	Average	Gamma-BHC, Total	0.022	ug/l	0.02

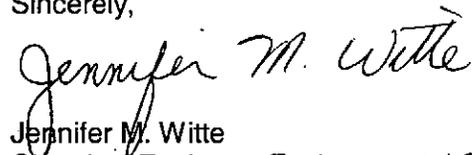
Outfall	Date	Parameter	Reported	Units	Permit Limitation
002	Average	Gamma-BHC, Total	0.00035	kg/day	0.0003
002	7/16	Chlorine Residual	0.1	mg/l	0.029
002	7/16	Chlorine Residual	1.66	kg/day	0.44
602	Average	CBOD ₅	17	mg/l	10
602	Average	CBOD ₅	0.023	kg/day	0.013
602	7/23	CBOD ₅	17	mg/l	15
602	7/23	CBOD ₅	0.023	kg/day	0.020
602	Average	Fecal Coliform	1700	#/100ml	1000

Please inform this office in writing within **thirty days** of receipt of this notification as to the reasons for the referenced violations, as well as a description of actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed for completion of the actions.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

If there are any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer, Environmental Specialist II
Division of Surface Water

JMW/mim