



State of Ohio Environmenta



Northeast District Office

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

August 31, 2009

RE: WAYNE COUNTY  
TRICOR INDUSTRIAL, INC., METALS DIVISION  
NON-TRANSIENT, NON-COMMUNITY  
PUBLIC WATER SYSTEM  
PWS ID # OH8530512  
STU ID # 8559637

Mr. Jon Stitzlein  
Tricor Industrial, Inc., Metals Division  
3225 W. Old Lincoln Way  
Wooster, Ohio 44691

**Subject: Notice of Violation for Failure to Submit a Corrosion Control Recommendation and Detail Plans for Corrosion Control Equipment**

Dear Mr. Stitzlein:

On August 19, 2009, I visited with you to review lead and copper rule requirements due to your exceedence of the lead action limit. Based on our review, Tricor remains in violation of failing to submit a corrosion control recommendation and detail plans for corrosion control equipment.

In a letter dated December 29, 2008, we outlined your requirements as follows. Notation in **bold** indicates your compliance with each requirement.

1. You will need to collect quarterly flushed EP samples for lead and copper for all of 2009. Please note that although your yearly monitoring schedules from our Central Office in Columbus may NOT reflect this sampling, it is still required. **We have received results from the first two quarters of 2009. Please continue to monitor during the 3<sup>rd</sup> and 4<sup>th</sup> quarter of 2009.**
2. By March 1, 2009, you will need to submit a corrosion control recommendation (CCR) to this office. During the meeting, we gave Mr. Sponaugle a template that you can use to create the CCR. Attached to the CCR, you will need a drawing showing your current water treatment schematic indicating where the source treatment (if proposed) and corrosion control equipment will be installed. **We have not received the CCR and schematic; therefore, Tricor remains in violation of our lead and copper rules.**
3. By March 1, 2009, you will need to submit detail plans for the corrosion control equipment. Once these are approved, you will have two years in which to install the equipment. **We have not received the detail plans; therefore, Tricor remains in violation of our lead and copper rules.**

4. You will need to collect and submit results of first draw lead and copper monitoring every six months. Please note that although your yearly monitoring schedules from our central office in Columbus may NOT reflect this sampling, it is still required. **Tricor has not conducted this sampling. However, upon further review, we have considered that the every six-month-sampling to be optional until your corrosion control equipment has been installed.**
  
5. Since we do not have a copy of your public educational (PE) notice for exceeding the lead action level, we do not know the status of your required PE posting. PE notices must remain posted for as long as the lead AL is exceeded. Enclosed is a copy of the required PE and a verification form. Please be sure that these PE notices remain posted until you have at least one set of first draw lead and copper monitoring showing no exceedence of the lead action level. Return the completed verification form, along with a copy of the PE that you posted, to this office by January 5, 2009. **We have received a copy of the PE and verification form. Further, during my visit to Tricor for our meeting, I observed the posted PE. Please understand that you will be required to re-post and submit a copy of your PE and verification form by November 29, 2009, and each year thereafter, until at least one set of first draw lead and copper monitoring shows no exceedences of the lead action level.**

**You must submit the CCR and detail plans (Items #2 and 3 stated above) by September 30, 2009.** If you cannot meet this deadline, if you have any questions regarding this correspondence, or if you need any assistance, please contact me at (330) 963-1194 or at my e-mail address, [beth.madis@epa.state.oh.us](mailto:beth.madis@epa.state.oh.us).

Sincerely,



Beth R. Madis  
Environmental Specialist  
Division of Drinking and Ground Waters

BRM/ams

cc: Wayne County Health Department  
Leroy Sponaugle, Tricor Industrial, Inc., Metals Division

ec: Dan Underwood, Ohio EPA, NEDO, DDAGW  
Kim Eppers, Ohio EPA, NEDO, DDAGW  
Mike Scott, Ohio EPA, NEDO, DDAGW