Environmental
Protection Agency

Governor
Lt. Governor
Director

December 8, 2011

RE: PRAXAIR INCORPORATED
OHIO EPA PERMIT 3IN00152
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Jason Gyrath, P.E., Plant Engineer
Praxair Incorporated
3102 Lake Road East
Ashtabula, OH 44004

Dear Mr. Gyrath:

On December 7, 2011, a site inspection was conducted at the above referenced facility at 3102 Lake Road East (State Route 531), Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. You represented Praxair Inc. (Praxair) during the inspection, and we spoke with James Drzewiecki and Tim Honkala 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. The last compliance inspection was conducted on December 21, 2010.

Industrial Waste Water Treatment

Ohio EPA notes that the system consists of an industrial wastewater treatment system for the production of oxygen, nitrogen, and argon by cryogenic air separation and distribution of those products. Wastewater consists of once-through non-contact cooling water (NOCCW) from argon compressors, oxygen compressors, nitrogen compressors, air compressors, and nitrogen turbines. Non-contact cooling water from the compressors is discharged directly into storm sewers within the plant. Floor drains from compressors and other plant equipment pass through one of three oil-water separators (OWS) located throughout the plant. OWS discharges are collected in a sump and sent to the package plant on the Elkem property which is not a part of this permit. NCCW mixes with storm water in the storm water drainage system. The system also collects storm water through a variety of catch basins north of the TLA Building, including the maintenance building and office, maintenance garage, north plant truck parking area, and refueling area. The wastewater discharges via Catch Basin No. 6 (Outfall 001) to Lake Erie. A plant plot plan is attached.

Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility, as well as receiving treated non-contact cooling water through the oil water separator. There are two distinct systems, with the north system consisting of a variety of catch basins north of the TLA Building, including the maintenance building and office, maintenance garage, north plant truck parking area, and refueling area. The wastewater discharges to Lake Erie via Catch Basin No. 6 (Outfall 001) to Lake Erie. The south storm water collection system collects water from areas south of the TLA Building, including the south paved area, rail car unloading area, and the storage building area. The wastewater discharges to Lake Erie via Catch Basin No. 17 (Outfall 002). A plant plot plan is attached.

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

330 963 1200
330 487 0769 (fax)
www.epa.ohio.gov

Plant Sanitary Waste Water Treatment
Plant sanitary wastes are conveyed to Elkem Metals sanitary wastewater plant located east of the Praxair facility for treatment and are not a part of this NPDES permit.

Observations and Notations

1. No process changes were noted from the 2010 inspection.

2. The general operation and maintenance of the oil and water separators appeared to be satisfactory. OWS are inspected weekly, with records maintained by Praxair. Oils are pumped from the OWS annually.

3. A grease trap is located adjacent to the maintenance building.

4. Fueling takes place in an enclosed building with floor drains. Floor drains collect in a sump and are connected to an existing OWS located on the south side of the maintenance building.

5. The design flow for outfall 001 is 8.0 MGD. Outfall 002 has no maximum design flow, as its discharge is limited to storm water.

6. The facility continues to experience operational difficulties with regards to flow measurement at Outfalls 001 and 002. This was noted during the 2010 inspection. Flow rates reported in the eDMR continues to be estimated based upon historical plant data. Praxair has had in excess of two years to work with a flow metering vendor to resolve this issue and has to-date not obtained a meter to accurately record flows at this facility.

7. A log book of repairs and observations is maintained at the facility. Praxair personnel perform routine observations, monitor the facility, and perform the sampling. William Schuler prepares the electronic discharge monitoring report (eDMR) and you submit of the eDMR through Ohio EPA's Web-based application.

8. The industrial wastewater/north storm water system discharge (Station 001) and the south storm water system discharge (Station 002) was found to be discharging clear.

9. The storm water pollution prevention plan (SWPPP) was updated on September 3, 2009, and is currently under revision to adjust for process changes and changes in personnel. The plan is anticipated to be revised by December 31, 2011. The annual site certification was completed on November 17, 2010 and the 2011 inspection is scheduled for December 15, 2011. The last inspection was completed on March 29, 2010, and the inspection also scheduled for December 15, 2011.

NPDES Permit Compliance Review
A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2010 through November 1, 2011, indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations
No limit violations were noted for the period reviewed.

Reporting Violations
No reporting code or frequency violations were noted for the reporting period reviewed.

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

Other Violations
Flow Monitoring: Part 1A of your NPDES permit requires that flow for Outfalls 001 and 002 be reported as a 24-hour total through a flow meter and not a 24-hour estimate. This issue was discussed during the comment period for your permit as issued September 1, 2010, as well as during the 2010 inspection. Praxair must provide an accurate method of measuring flow through Outfall 001 and not estimating flow. Please provide Ohio EPA with a schedule to either repair your existing flow meter to accurately record flows at the facilityor replace the meters.

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:bo

File: Industrial/Praxair Inc./pc