



Environmental
Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

February 1, 2012

RE: CANTEX, INC.
PERMIT NO. 31F00024
PORTAGE COUNTY
MANTUA

Mr. Don Langley, Plant Manager
Cantex, Inc.
11444 Chamberlain Road, Suite #1
Aurora, Ohio 44202

CERTIFIED MAIL

Dear Mr. Langley:

On January 20, 2012, an inspection of the above referenced facility was conducted. The facility was represented by Mr. John Gerbec, Maintenance Manager and you. The purpose of the inspection was to: (1) evaluate the performance of the wastewater treatment system along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were discussed:

1. The Facility's NPDES permit expires on March 31, 2012.
2. In order to receive authorization to discharge beyond the above date of expiration, the permittee is required to submit the appropriate renewal forms (form1, 2E and the Antidegradation Addendum) to the Ohio EPA no later than 180 days prior to the above date of expiration per the permit language contained on page one of the facility's NPDES permit. **The permit renewal forms shall be submitted immediately.** Please note that a \$ 200.00 dollar application renewal fee is required at the time of submission. The check shall be made payable to: "Treasurer, State of Ohio."
3. Precision Analytical collects the effluent samples and performs the analytical analysis.
4. Precision Analytical currently submits the analytical results to Ohio EPA through the web based electronic Discharge Monitor Reporting (e-DMR) system. As previously discussed, the results may be entered by Precision Analytical. **However, the e-DMR report must be pinned by the person at Cantex who is in responsible charge of the wastewater treatment plant.** You were notified of this requirement, in person, on January 12, 2010, and also by written correspondence from this office dated February 11, 2010. To date, Precision Analytical is still pinning the facility's electronic discharge monitoring reports.

5. **You are directed to obtain your own Personal Identification Number (PIN) for your facility and immediately begin pinning your monthly discharge monitoring reports.** Should you need any assistance on the matter, please contact Mr. Jamie Roberts, Ohio EPA, Surface Water Information Management Administrator, at (614) 644-2054. Precision Analytical should be notified they are no longer authorized to pin the facility's e-DMR reports.
6. **You were informed that this Office has no record of receiving any discharge monitoring reports since April 2011.** You indicated that you were not aware of this reporting deficiency. It was agreed upon that the Cantex employee who is in responsible charge of the treatment plant will begin to pin the facility's monthly e- DMR report.
7. During the inspection, you contacted Precision Analytical to determine the status of the missing monthly reports. Mr. Carey Methias, from Precison Analytical indicated that the would look into this and get back to you.
8. All missing e-DMR reports since April 2011 should be electronically submitted immediately.
9. The facility's NPDES permit requires that the wastewater treatment plant (WWTP) be under the supervision of a Class I State Certified WWTP Operator. You were notified of this by written correspondence from this office dated October 23, 2007. You were once again notified of this requirement in person on January 12, 2010 and also by written correspondence from this office dated February 11, 2010. To date, you have not hired an operator to oversee the wastewater treatment plant. You are directed to immediately hire a Class "A" (formerly Class "I") waste water treatment plant operator. You committed to hire a Class "A" waste water treatment plant operator by March 31, 2012.
10. **Once a certified operator is hired, they should immediately submit the "Operator of Record" form to Ohio EPA Northeast District Office and Central Office.**
11. **The WWTP operator shall immediately begin to maintain a log book which documents the dates and time spent at the treatment plant along with the duties performed.**
12. The Facility's current permit contains outfall monitoring station 3IF00024001 and internal monitoring station 3IF00024602. As previously discussed during the last inspection, you indicated that outfall 3IF00024001 no longer has a discharge. You also indicated that the process wastewater discharge pipe has been sealed and there is no longer a discharge to internal monitoring station 3IF00024602. Both of these stations are no longer required as a result of the closed loop process wastewater treatment system which was installed. This system was approved under permit-to-install No. 653441. The facility has been reporting code "AL" for outfall monitoring station 3IF00024001 and internal monitoring station 3IF00024602. Reporting code "AL" indicates that no discharge has occurred for the entire month. Based on this information,

outfall monitoring station 3IF00024001 and internal monitoring station 3IF00024602 will be removed from the facility's NPDES permit renewal.

13. You indicated that the facility's Storm Water Pollution Prevention Plan was last updated in 2008. **You indicated that you need to modify/update the plan and would submit it to this office.**
14. The plant design of the wastewater treatment system is 18,000 gpd.
15. The blowers were not running. Therefore, the plant was not being aerated.
16. Both the sludge return line and skimmer return line were not operating since the plant was not being aerated.
17. Both surface sand filter beds were covered with a layer of snow. One bed had tall vegetation growing in it. However, the other bed appeared to be free of vegetation and draining properly.
18. The outfall was not observed.
19. Mr. Gerbec indicated that the trash trap is pumped out twice per year and sludge is pumped from the WWTP once per year by Allen Drain located in Streetsboro. Purchase order records dated December 16, 2011 indicate the trash trap and treatment system were both recently pumped out.
20. Please note the following includes some of the changes to be made to the facility draft NPDES permit:
 - a. A permanent marker at the outfall is required to be posted per the requirement of Part II, in the facility's NPDES permit.
 - b. A schedule of compliance will be placed in the permit renewal which requires the facility to meet E.Coli limits in the final table for monitoring outfall station 3IF00024002.
 - c. Color, severity and odor, severity have been removed from outfall monitoring station 3IF00024002.
 - d. Phosphorus, total monitoring has been added at outfall monitoring station 3IF00024002.
 - e. Nitrite & nitrate monitoring has been added at outfall monitoring station 3IF00024002.
 - f. Outfall monitoring station 3IF00024001 was removed from the permit.
 - g. Internal monitoring station 3IF0024602 was also removed from the permit.
21. Once the facility's renewal permit is drafted, it will be public noticed. During public notice, you will have a 30 day period to evaluate your permit and comment in writing any concerns you may have.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2010 through December 31, 2011 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00530	Total Suspended Solids	30D Conc	12	14.	2/1/2010
002	00530	Total Suspended Solids	30D Qty	0.09	.14307	2/1/2010
002	00530	Total Suspended Solids	1D Qty	0.14	.14307	2/22/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.15	5/6/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.06	6/7/2010
002	00300	Dissolved Oxygen	1D Conc	5.0	4.87	6/7/2010
002	00530	Total Suspended Solids	30D Conc	12	18.	7/1/2010
002	00530	Total Suspended Solids	1D Qty	0.14	.21025	7/1/2010
002	00530	Total Suspended Solids	30D Qty	0.09	.21025	7/1/2010
002	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.5	7/1/2010
002	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.02	.0292	7/1/2010
002	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.02	.0292	7/1/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.07	7/1/2010
002	00300	Dissolved Oxygen	1D Conc	5.0	4.21	7/1/2010
002	00530	Total Suspended Solids	30D Qty	0.09	.11681	8/1/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.08	8/9/2010
002	00300	Dissolved Oxygen	1D Conc	5.0	3.02	8/9/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.18	9/28/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	.18	10/25/2010
002	00530	Total Suspended Solids	30D Conc	12	22.	1/1/2011
002	00530	Total Suspended Solids	30D Qty	0.09	.29977	1/1/2011
002	00530	Total Suspended Solids	1D Conc	18	22.	1/18/2011
002	00530	Total Suspended Solids	1D Qty	0.14	.29977	1/18/2011
002	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.06377	3/1/2011
002	80082	CBOD 5 day	30D Qty	0.08	.09538	3/1/2011
002	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.05	.06377	3/7/2011
002	00300	Dissolved Oxygen	1D Conc	5.0	3.81	4/14/2011

As previously noted above, no e-DMR reports have been submitted to this office since April 2011.

No code or frequency violations were noted.

Please notify this office, in writing, within 14 days receipt of this letter, of your intentions to address items 2, 4, 5, 6, 8, 9, 10, 11, and 13. The letter should include dates either actual or proposed.

