



**Environmental  
Protection Agency**

**John R. Kasich, Governor**  
**Mary Taylor, Lt. Governor**  
**Scott J. Nally, Director**

March 30, 2012

RE: 3DP00048\*AP  
SAINT-GOBAIN CRYSTALS  
INDUSTRIAL USER INSPECTION  
GEAUGA COUNTY TROY OAKS WWTP  
GEAUGA COUNTY

Heather Avery  
Saint-Gobain Crystals  
17900 Great Lakes Parkway  
Hiram, Ohio 44234

**NOTICE OF VIOLATION**

Dear Ms. Avery:

On February 15, 2012, representatives of this office conducted an Industrial User Inspection of the above facility. The Ohio EPA was represented by Donna Kniss and Ryan Laake. Jeffrey Kennedy and Cooper Blair represented the company. You provided additional information in a telephone conversation on March 2 and in e-mails on March 8 and March 27, 2012. Saint-Gobain Crystals discharges waste water to the Geauga County Troy Oaks wastewater treatment plant (WWTP) and has been issued Indirect Discharge Permit (IDP) 3DP00048\*AP. The purpose of the inspection was to evaluate compliance with the existing IDP.

Saint-Gobain employs approximately 205 employees in a three shift per day, six day per week operation. Saint-Gobain manufactures solid crystals for use in other products such as scintillation counters.

In addition to the sanitary wastewater, Saint-Gobain discharges water softener backwash water and cooling tower blowdown to the sanitary sewer. Because the Geauga County Troy Oaks is a 60,000 gpd WWTP discharging to one of Akron's drinking water reservoirs, the Ohio EPA determined that the Saint-Gobain discharge required monitoring. The IDP requires a composite sample when both the cooling tower blowdown and softener backwash are discharging.

A review of the Ohio EPA discharge monitoring report (DMR) data revealed that no sample results have been reported since the IDP was issued on November 1, 2009. Messr. Kennedy and Blair located some sample results, and stated that you would address this issue when you returned to your office.

In our telephone conversation on March 2, you indicated that B & J Environmental provided the sampler, but that there were difficulties in collecting the sample, mainly timing the aliquot collection with the discharge times. We discussed alternative means of collecting a representative sample, including manual composites. You stated that you would contact me with additional information on how the discharges occur, and you would provide all the discharge sample data you could locate.

In you March 8 e-mail, you provided two sample results, dated March 11, 2010 and June 15, 2010. There were 13 sample results required between the permit effective date of November 1, 2009 and December 31, 2011, meaning Saint-Gobain collected 15% of the required analyses. No samples have been collected for 18 months.

Saint-Gobain Crystals is in significant non-compliance for this failure to monitor the discharge in accordance with the terms of the IDP. The March 11, 2010 sample contained 11,439 mg/l total dissolved solids. This concentration is high enough to cause significant interference with the Troy Oaks WWTP, but without flow data, the impact is impossible to determine. If Saint-Gobain was having problems collecting samples, it was obligated to contact this office to discuss those problems rather than waiting for this office to contact them.

Please provide a response within 15 days of the receipt of this letter, proposing an alternative means of collecting a representative sample. Until this office concurs with an alternative sampling protocol, Saint-Gobain must collect separate manual composite samples of both the softener backwash and cooling tower blowdown once per month. The manual composites must consist of a minimum of three aliquots, taken between 15 and 60 minutes apart. 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  
District Engineer  
Division of Surface Water  
Northeast District Office

DJK/cs

cc: Doug Bowen, Geauga County Water Resources  
Ryan Laake, Ohio EPA, DSW, CO

ec: Laura Weber, Ohio EPA, DSW, NEDO

File: Pretreatment Industrial User/Permit-Compliance