



**Environmental
Protection Agency**

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

April 4, 2012

Mr. Roger Lewis
Director of Maintenance
Tectum, Inc., Newark Plant
105 S. Sixth Street
Newark, OH 43055

**Re: Tectum, Inc., Newark Plant
NPDES Permit 4IN00001/ OH0007285
Compliance Evaluation Inspection
Licking County**

Dear Mr. Lewis:

On April 2, 2012, a Compliance Evaluation Inspection was conducted at the Tectum, Inc., Newark Plant. Present for the inspection were Steve Melroy and Joe Kieber representing Tectum, Inc. and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the discharge of non-contact cooling water to Raccoon Creek. The following items were discussed during the inspection:

- Suspended solids and pH limit violations were adequately explained and rectified. Frequency violations for total filterable residue occurred because the analytical laboratory failed to perform the analysis for this parameter on 2 occasions. This problem has been rectified as well. No violations have occurred over the last 8 months.
- The facility currently uses flow estimates of 20,000 gallons per day based on potable water usage. In order to confirm discharge flow values from outfall 001, the facility shall obtain actual daily discharge flow readings for a typical day. The method to obtain these discharge measurements may be as simple as filling a calibrated bucket and using a stopwatch and averaging the values obtained during a typical production day. Since the discharge occurs at a variable rate and some of the wastewater is recycled, variation in timing the measurements will be necessary. More sophisticated methods may also be used if desired. Once the flow study is completed, please forward the results to Paul Vandermeer, Ohio EPA, DSW, CDO.

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Director of Maintenance
Tectum, Inc., Newark Plant
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If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Vandermeer", with a long horizontal flourish extending to the right.

Paul L. Vandermeer
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

cc: Paul Vandermeer

PLV/hsm Tectum

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00001	OH0007285	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
4/2/2012	10:45 AM	11:10 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Tectum, Inc. Newark Plant 105 S. Sixth St. Newark, OH 43055	5/1/2011
	Permit Expiration Date
	4/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Steve, Melroy, Safety Administrator; Joe Keiber, Maintenance Supervisor	(740) 345-9691
Name and Title of Responsible Official	Phone Number
Roger Lewis, Director of Maintenance	(740) 345-9691

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	See cover letter
S	Operations & Maintenance	No changes to cooling water management at plant.
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	Water usage records used for flow. Confirmation of flow values requested.
S	Receiving Waters	
N	Laboratory	Coshocton Environmental Testing performs analyses.

Comments:

Signatures			
	4/3/12		4/3/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

Compliance Data for Tectum Inc Newark Plant between 3/1/2009 to 3/1/2012

Summary

Permit Effluent Limit Violations: 3
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 2
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	001	Total Suspended Solids	30D Conc	30	31.5	6/1/2011
June 2011	001	Total Suspended Solids	1D Conc	45	59.	6/20/2011
June 2011	001	pH	1D Conc	9.0	9.71	6/20/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Exceeds	Reported	Violation Date
May 2011	001	Residue, Total Filtera	1/2Weeks	1	0	05/01/2011
May 2011	001	Residue, Total Filtera	1/2Weeks	1	0	05/15/2011