



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 24, 2012

RE: NPDES PERMIT # 3IF00007
HARDY INDUSTRIAL TECHNOLOGIES, LLC
679 HARDY ROAD, PAINESVILLE
LAKE COUNTY
INDUSTRIAL

Mr. Scott Forster
Vice President
Hardy Industrial Technologies, LLC
5005 Rockside Road, Suite 600-070
Independence, OH 44131

Dear Mr. Forster:

On April 19, 2012, this writer conducted a compliance evaluation inspection of Hardy Industrial Technologies, LLC. Mr. Greg Rechner, Manager of Technical Services and Mr. Gary Gillan, QA/QC Chemist, represented the facility during the inspection. The purpose of the inspection was to observe the discharges at the permitted outfalls and to evaluate the facility's compliance status with respect to the effluent limitations, terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

Hardy Industrial Technologies has the following discharges:

- Outfall 001 is a storm water outfall located at the northwest section of the site that discharges to a 48-inch storm sewer.
- Outfall 003 is a storm water outfall located east of Building 164, near the center of the site. The drainage area for this outfall is adjacent to the south side of the process drainage area. The outfall discharges to a 27-inch storm sewer, and then the 48-inch storm sewer.
- Outfall 004, located at the northwest corner of the fire water supply basin, is a once through non-contact cooling water discharge. The outfall discharges to the 27-inch storm sewer and then the 48-inch storm sewer.
- Outfall 005 is a storm water outfall that collects drainage from the northeast section of the property. The outfall discharges to the 48-inch storm sewer.
- Outfall 900 is located at the Grand River and receives flow from the 48-inch storm sewer consisting of flow from Outfalls 001, 003, 004 and 005 in addition to off site storm water.
- All contaminated storm water, process water, and sanitary wastes are discharged to a pretreatment system prior to discharging to the Gary L. Kron Water Reclamation Facility.

During the inspection, the following items were noted:

- All of the storm water and process water outfalls were inspected. The discharges were clear and no visual impacts were observed.

- The Storm Water Pollution Prevention Plan (SWP3) is not up to date. The plan does not make mention of the caustic spill that occurred onsite on July 12, 2011. The spill report for incident must be included in the plan and the plan must reflect changes made as a result of the incident. The plan was last updated September 2011. Failure to maintain an updated SWP3 is a violation of Part IV of the NPDES permit.

A review of the Discharge Monitoring Reports (DMRs) covering the period of June 2009 through March 2012 revealed the following effluent limitation violations:

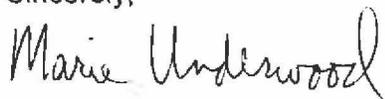
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
900	00011	Water Temperature	1D Conc	68	69.	5/26/2010
900	00011	Water Temperature	1D Conc	68	70.	5/27/2010
900	00011	Water Temperature	1D Conc	68	71.	5/28/2010
900	00011	Water Temperature	1D Conc	68	71.	5/29/2010

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code, Chapter 6111.

Please inform this office, in writing, within ten days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Should you have any questions concerning this letter, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/cs

cc: Mr. Greg Rechner, Manager of Technical Services