



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

May 15, 2012

RE: 3DP00013\*CP  
GENERAL COLOR  
INDUSTRIAL USER INSPECTION  
MINERVA  
CARROLL COUNTY

Keith W. Gartner  
President  
General Color  
350 Bridge Street, P.O. Box 7  
Company address 2

Dear Mr. Gartner:

On May 1, 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. You represented the company. General Color discharges waste water to the Village of Minerva wastewater treatment plant (WWTP) and has been issued Indirect Discharge (IDP) permit 3DP00013\*CP. The purpose of the inspection was to evaluate compliance with the existing IDP.

General Color employs approximately nineteen people in a one shift per day, five days per week operation. General Color provides color matching services and manufactures colors in dry, liquid, and extruded plastic form. Extruded plastic is cooled with contact cooling water, which is filtered and recycled until too cloudy for use. At that point, the contact cooling water holding tank is discharged to the sanitary sewer. The tank is approximately 1500 gallons, and takes approximately two hours to discharge. The holding tank is equipped with an overflow alarm.

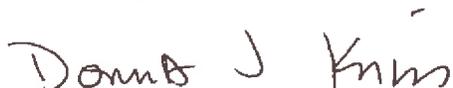
You collect a grab sample of the holding tank discharge for pick-up by the contract laboratory, Ream and Haager. The current practice is to leave the sample cooler in the unattended lobby. We discussed the need for the sample to remain in someone's personal control in order to preserve the chain of custody. Currently, pH analysis is conducted at the laboratory. We discussed the fact that pH must be analyzed within 15 minutes of sample collection in order to be considered valid.

A review of the discharge monitoring report (DMR) data showed that General Color has not submitted DMR data since July 2008. You indicated that sample collection and analysis has continued, and that you had previously filed the paper forms when you received them. We discussed the fact that the Ohio EPA has transitioned to an electronic reporting system, and that General Color must use this system to report sample results. Mr. Laake asked that you provide him with copies of monitoring results for July 2008 through December 2010. After you obtain the personal identification number needed to file electronic reports, you can report all 2011 data, and report the first half of 2012 when it is due in July 2012. Please note that continued failure to report data is a violation of General Color's IDP requirements, and could result in escalated enforcement.

GENERAL COLOR  
MAY 15, 2012  
PAGE 2 OF 2

Please provide the requested information to Mr. Laake by June 1, 2012. 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,

A handwritten signature in black ink that reads "Donna J Kniss". The signature is written in a cursive, slightly slanted style.

Donna J. Kniss  
District Engineer  
Division of Surface Water  
Northeast District Office

DJK/cs

cc: Don Luedtke, Minerva WWTP  
Ryan Laake, Ohio EPA, DSW, CO

ec: Joe Trocchio, Ohio EPA, DSW, NEDO

File: Pretreatment Industrial User/Permit-Compliance