



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

May 16, 2012

RE: GEAUGA COUNTY  
MIDDLEFIELD TWP  
BRIDGE LAKE FARM  
NPDES # 3PW00029\*BD

Mr. Brian Fink, Manager of Operations  
Johnsonite  
16910 Munn Road  
Chagrin Falls, OH 44023

**NOTICE OF VIOLATION**

Dear Mr. Fink:

On May 9, 2012, I met with you and Mr. Charles Sahyers of Johnsonite and Ms. Barbara Knecht of HzW Environmental. An inspection was conducted of the wastewater treatment system at the facility. The intent of the inspection was to review operations and maintenance of the treatment system and gather information needed to renew the National Pollutant Discharge Elimination System (NPDES) permit. The existing NPDES permit expires on October 31, 2012.

Johnsonite extrudes plastic for building materials. The manufacturing facility includes general office space and extrusion operations, which are all located in one building. The facility operates 24 hours and includes four shifts a day. The building employs around 200 employees.

The facility recently eliminated their sanitary discharge by connecting to a sanitary sewer. The wastewater treatment plant (WWTP) was effectively taken out of service and demolished. The current discharge from the facility includes non-contact cooling water, boiler blowdown, storm water and ground water. The discharges are collected in a fire pond located on site. The effluent from the fire pond discharges to Bridge Creek via an unnamed tributary.

**NPDES PERMIT COMPLIANCE**

As of December 17, 2010, the connection to sanitary sewers was completed and all sanitary wastes from the facility are now diverted to McFarland Creek WWTP. As such, Outfall 001 (final effluent) and Outfall 588 (sanitary sludge) will be eliminated from the renewal NPDES permit. The permit shall only include outfall 003.

Discharge monitoring reports from January 1, 2009 through May 1, 2012 were reviewed for compliance with the current NPDES permit. There was one violation reported at outfall 003, which is shown below:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2009	003	pH	1D Conc	9.0	9.06	9/4/2009

According to discharge monitoring reports submitted between January 1, 2009 and May 1, 2012, the average flow from outfall 003 was 11,316gpd.

The facility uses non-contact cooling water in the plant operations. It is understood the facility uses additives in the non-contact cooling water system. Upon further review, your NPDES permit requires the facility to obtain written approval from the director of Ohio EPA prior to using non-contact cooling water additives, which discharge to waters of the state. Our records do not indicate the facility obtained any such written approval from the director. As such, Johnsonite is in violation of the NPDES permit, Part II, Section E, which requires;

"In the event that the permittee's operation requires the use of cooling water or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use. Reporting and testing requirements to apply for permission to use additives can be obtained from the Ohio EPA, Central Office, Division of Surface Water, Water Resources Management Section. Reported information will be used to evaluate whether the use of the additive(s) at concentrations expected in the final discharge will be harmful or inimical to aquatic life."

The additives MSDS sheets and concentrations were obtained during the inspection. The additives and concentrations this office has on record are the following:

Additive	Concentration (ppm)
3D TRASAR 3DT289	100
H-550	50
NALCO 7341	25

The facility has asked to exempt the facility from all storm water requirements in the NPDES permit. During the inspection, it appeared the facility qualified for the no exposure certification. Because the facility qualifies for no exposure, you are exempt from permit requirements until your facility no longer qualifies for No Exposure Certification. If your facility changes and can no longer claim no exposure to storm water, you must submit the appropriate permit application for storm water discharge. The No Exposure Certification form must be submitted to Ohio EPA at least once every five years.

The facility must file an Industrial No Exposure Certificate to grant the exemption from the NPDES permit requirements. To date, this office has no record of the Industrial No Exposure Certificate being submitted.

#### INSPECTION SUMMARY

The facility is well maintained and in good operation. The fire pond collects discharges from non-contact cooling water, boiler blow down, storm water and ground water. The fire pond is in good condition and accessible. The outfall from the fire pond had some algae accumulation located in the pipe. The algae was removed during the inspection. The pond effluent appeared to be clear and the receiving stream appeared to be clear and free of solids.

SUMMARY

In summary, the following items must be completed within the required deadline:

- 1) Obtain written permission from the director of Ohio EPA to discharge non-contact cooling water treated with additives. This office has sent preliminary information to Central Office, DSW pertaining to the additives used at this facility. Johnsonite must submit a formal request for the director's approval as soon as possible but no later than June 115, 2012. The request must be submitted to:

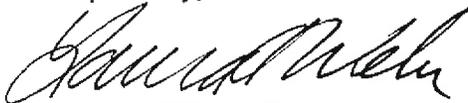
Ohio EPA, Central Office, DSW  
Water Resources Management Section  
P.O. Box 1049  
Columbus, OH 43216-1049

- 2) Submit the Industrial No Exposure Certification Form as soon as possible but no later than June 1, 2012.

Your NPDES renewal permit cannot be public noticed until these two items are addressed. Once these items are finalized, the NPDES permit will be public noticed. The non-contact cooling water issue could potentially lead to an Antidegradation review, which would further delay the public notice of a draft NPDES permit.

Once the permit is public noticed, you will have 30 days to make any comments. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.  
Environmental Engineer  
Division of Surface Water

LAW/cs

cc: Ms. Barbara Knecht, HzW Environmental  
Dave Sage, Geauga County Health Department

File: Industrial/Johnsonite 3IF00010