



**Environmental
Protection Agency**

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

May 31, 2012

RE: KING LUMINAIRE JEFFERSON PLANT
OHIO EPA PERMIT 3PR00324
JEFFERSON TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Ms. Jessica Detweiler, Plant Manager
The Stresscrete Group
King Luminaire, Company, Inc.
P.O. Box 266
Jefferson, OH 44047

Dear Ms. Detweiler:

On May 30, 2012, a site inspection was conducted at the above referenced facility at 1153 State Route 46 North, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Craig Pierce represented your primary contract operator, and Michael Hamilton represented King Luminaire Company, Inc. during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspections were conducted on August 5, 2011 and November 1, 2011.

There are no floor drains within the manufacturing building. No industrial process wastewater is discharged to the wastewater treatment system. The sole source of the wastewater flow is domestic sewage from employee restrooms. Storm water management includes water from building footer drains and runoff from paved areas of the facility. Storm water is diverted to ditches around the perimeter of the facility. There is no storm water pond. Since the last inspection, you have constructed a 40 foot by 200 foot warehouse to house materials formerly stored outside exposed to the elements.

Observations

The following observations were made during the inspection:

1. The flow equalization pumps and alarms were cycled and the pumps found in operating condition.
2. The plant was operated by Dustin Lewis and Roger Osburn of Lewis Wastewater Management through April 30, 2012. The plant is currently operated by Craig Pierce as the primary operator under contact as of May 1, 2012 on behalf of King Luminaire, with Roger Osburn maintained as a backup operator. Dustin Lewis, Marlene Knopsnider, Roger Osburn, and Craig Pierce are currently listed as the Operators of Record (ORCs) of this facility.
3. A log book of repairs and observations is maintained at the WWTP. Prior to May 1, 2012, Roger Osborne of Lewis Wastewater Management (Lewis), performed routine operations at the WWTP, monitored the facility, and performed the sampling and Lewis submitted the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.

As of May 1, 2012, Craig Pierce assumed these duties. Michael Hamilton performs daily plant inspections and notifies Mr. Pierce if there is a problem.

4. The contents of the aeration tank were a dark brown color, had fair aeration and had a slight septic odor. The color and odor suggest that the biological system may need attention, most likely additional aeration. One blower was off during the inspection. The blowers were cycled and found in operating condition.
5. Clarifiers were observed relatively clear, with some floating scum. The skimmer and return sludge lines were observed in operational condition. Effluent weirs were noted as reasonably clean and free of debris.
6. The pumps for the sand filter dosing station were cycled and found in operating condition.
7. The surface sand filters were found in good condition, and was discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. Both filters were found as free of vegetation, raked, and level.
8. Sludge has not been removed from this facility in 2012.
9. The chlorine contact tank was found stocked with appropriate chemicals and was providing disinfection for the facility. The dechlorination system was also found stocked with chemicals and was providing dechlorination for the facility.
10. The final discharge was found discharging an effluent of satisfactory visual quality; clean and clear with no noticeable odor.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2011 through May 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.020	.02256	12/1/2011

Part III, Item 12 requires King Luminaire to notify Ohio EPA of permit violations. A written explanation as to why the above limit violations occurred must be provided along with measures to ensure that it is not repeated.

Reporting Violations

No reporting frequency or reporting code violations were noted for the period reviewed.

Compliance Schedule

The current NPDES permit does not contain a compliance schedule.

Comments

1. Accurate Annual Sludge Reporting: Ohio EPA notes that Part II, Item L of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Although a report has been filed, Ohio EPA's files reflect that King Luminaire has never removed sludge from this facility dating to at least 2010. I know a 2010 inspection found the plant septic and required removal of sludge from the aeration tanks. If sludge was removed from this facility in 2010 or 2011, the affected report(s) must be amended and a revised report submitted to Chris Moody of this office as prescribed by your NPDES permit.
2. Revised Operator of Record Notification: OAC 3745-7-02 requires notification of a change of the operator of record within three days of such a change. While King Luminaire has added Craig Pierce as the Operator of Record, Marlene Knopsnider and Dustin Lewis have not been removed. If Ms. Knopsnider and Mr. Lewis are no longer seeing your facility, these operators should be removed as ORCs for this facility. You may use the same form used to add operators.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Dustin Lewis, Lewis Wastewater Management
Roger Osburn
Craig Pierce

File: SP/Ashtabula/Jefferson Twp/King Luminaire Company, Inc.(3PR00324)