



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 16, 2012

RE: LAKE COUNTY  
PERRY TOWNSHIP  
MID-WEST MATERIALS INC.  
NPDES PERMIT NO. 3PR00377\*CD AND  
NPDES PERMIT NO. 3GU00330\*DG

Michael Alley, Chief Financial Officer  
Mid-West Material Inc.  
3687 Shepard Road  
P.O. Box 345  
Perry, Ohio 44081

Dear Mr. Alley:

On July 10, 2012, this writer conducted a compliance evaluation inspection of the sanitary wastewater treatment plant and the ground water remediation system. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. You and Mr. Mark Chabot, Operations Manager, accompanied this writer during the inspection.

Sanitary Sewage Plant

At the time of inspection, the sanitary sewage plant was in operation. The following observations were noted:

- The mixed liquor suspended solids concentration appeared low. The settling tank skimmer was below the water level. The extended aeration water level had been lowered in preparation for reseeded of the plant later during the day.
- Maintenance of the filter beds was satisfactory. New gravel and filter sand was placed in the filter beds last month.
- The chlorinator contained chlorine tablets, as required
- The dechlorinator contained bisulfate tablets, as required.
- The plant effluent was free of solids, oil and grease.
- The Operator of Record Certification (ORC) log book was satisfactory.

A review of the Discharge Monitoring Reports (DMRs) covering October 2010 to June 2012 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.18	3/1/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	5.18	3/22/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	17.22	6/1/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	17.22	6/8/2011

In addition, the DMRs reveal that sludge wasting has not occurred at this facility. In order to properly operate an extended aeration plant, sludge must be wasted from time to time. *Whenever sludge is wasted, the amount wasted must be noted. The total amount of sludge that has been wasted for the entire year must be reported on the December DMR. Please consult with your operator of record.*

Groundwater Remediation System

This treatment system was installed as a result of a complaint received by the Division of Emergency & Remedial Response (DERR) in 2005. The complainant observed a visible sheen in a tributary of Red Creek. DERR traced the source of the sheen back to Mid-West Materials. Hydraulic oil from a leaking process line had accumulated into a cracked concrete pit and entered the groundwater table. The process line and concrete pit were repaired. An Ohio EPA Approved treatment system was installed to treat the contaminated groundwater. A General NPDES Permit for Petroleum-Related Corrective Actions was issued. The treatment unit discharges in the creek located to the east of the facility. At the time of inspection, the system was in operation. A grab sample of the effluent taken after treatment, but prior to exiting the building revealed no visible sheen. The grab sample was taken inside the building because the discharge pipe was surrounded by overgrown vegetation. The vegetation around the discharge pipe should be cut back in order to expose the pipe.

During the inspection, the topic of removal of the groundwater remediation system was raised. This office would require an evaluation by an engineering consultant, knowledgeable about groundwater remediation. An engineering report must be submitted to this office with data justifying recommended actions. After this office reviews the report and it is determined that the system should be abandoned, a Notice of Termination (NOT) of the General NPDES permit must be submitted to this office when the petroleum related corrective action treatment system has been removed and there is no longer a discharge to waters of the state. Submission of the NOT constitutes notice that the applicant is no longer authorized to discharge into state waters under the NPDES general permit program. All forms can be obtained from the Division of Surface Water website at [www.epa.state.oh.us/dsw](http://www.epa.state.oh.us/dsw).

A review of the DMRs covering October 2010 to June 2012 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.45	6/28/2011

The DMRs also reveal that each time total recoverable lead was reported on the DMRs as discharging to waters of the state, the data substitution code AA was reported. This means that the amount of lead found in the sample was below detection. The method detection limit is reported on the DMRs as 20 ug/l. The NPDES permit limit for lead is 6.4ug/l. With a method detection limit higher than the permit effluent limit, the amount of lead found in a sample could be less than or equal to 6.4 ug/l (which meets the permit limit) or a value between 6.4 and 20 ug/l (which exceeds the permit limit) when the AA-code is reported. This agency is unable to determine if the permit limit for lead has been met. Please consult with the laboratory performing the analysis for total recoverable lead. Laboratory personnel should refer to the Appendix B to Part 136, Title 40 of the Code of Federal Regulations (40CFR 136) for information on the procedure for determining

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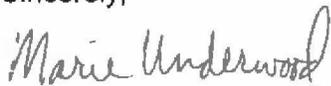
appropriate method detection limits. Specific questions from your laboratory analyst concerning test methods can be directed to the Division of Environmental Services at (614) 644-4247.

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

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

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

Sincerely,

A handwritten signature in cursive script that reads "Marie Underwood".

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

MU/cs