



**Environmental Protection Agency**

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

July 26, 2012

RE: PET PROCESSORS, LLC  
NPDES PERMIT NO. 3IF00009  
LAKE COUNTY  
1350 BACON ROAD

Mr. David Davis  
Operations Manager  
PET Processors, LLC  
1350 Bacon Road  
Painesville, OH 44077

Dear Mr. Davis:

On July 18, 2012, this writer conducted a compliance evaluation inspection of the wastewater treatment systems serving the above referenced facility. The purpose of the inspection was to evaluate the wastewater treatment plant's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES). You accompanied this writer during the inspection.

**Wastewater Discharges**

Outfall	Wastewater generated	Treatment provided
601	Sanitary wastewater	Grinder pump, trash trap, flow EQ, 7,728 gpd extended aeration plant, surface sand filters, UV disinfection.
602	Backwash from filters used to remove solids from Lake Erie intake	Settling in the ash pond-east. (Note: East pond has not been in use since 1980).
603	Once through non-contact cooling water, fire tank draining, rail car wash of interior, boiler blow down	none
604	Backwash from filters used to remove solids from Lake Erie intake	Settling in the ash pond-west.
605	Air scrubber for Extruder Line 1, water from periodic dumping of contents of and spillage from contact cooling bath for extruded plastic	Above ground oil/water separator
001	Combined effluent from internal stations 601,602,603,604, and 605	Not applicable
588	Sludge station	Sludge collection

**Inspection Observations**

At the time of the inspection, no significant problems were noted. The following was observed:

1. Outfall 001 was visually clear, showing no environmental impact.
2. The sanitary sewage plant was producing an effluent (Internal station 601) of satisfactory visual quality in that there was no evidence of debris, oil or grease.

The general operation and maintenance of the plant was satisfactory. The aeration tank content was chocolate brown in color. Because the plant is underloaded, you stated during the inspection that the plant is seeded approximately every two months.

The filter beds still contain overflow risers. These risers are not a part of the approved design of the sewage plant and must be removed. During the inspection, you stated that you may permanently plug the risers with concrete, rendering them nonfunctional, instead of removing them. Please inform this office in writing when the risers are removed or plugged with concrete.

3. Mr. Dustin Lewis of Clean Streams Inc. is the contract operator of record (ORC) for PET Processors. The operation and maintenance records book was satisfactory.
4. You and Mr. Ron Hubbard have received a Class A wastewater treatment operator license. If either of you wish to be listed as an ORC, please complete the enclosed ORC Notification Form. Should you or Mr. Hubbard decide to become an ORC, all requirements as outlined in Ohio Administrative Code 3745-7 will apply to you, just as they do with your current contract ORC.
5. The discharge from Internal Station 603 was visually clear with no evidence of debris, oil or grease.
6. Metal screens have been placed in the storm water manholes on the northwest side of the property to capture any spilled raw material (plastic) from the rail cars that may drain to the manhole during a rain event.
7. The discharge from Internal Station 604 showed no environmental impact. An excessive amount of overgrown vegetation was blocking the pathway to the effluent discharge. This is a potential safety hazard that must be corrected. The vegetation must be cut back. In addition, any vegetation preventing or interfering with one's ability to obtain a representative sample of the discharge must be removed.
8. Internal Station 605 was not discharging.

### **Compliance History**

A review of your Discharge Monitoring Reports (DMRs) for the period of September 2010 through June 2012 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00552	Oil and Grease, Hexane	1D Conc	10	21.	2/23/2012
001	00552	Oil and Grease, Hexane	1D Conc	10	38.	5/11/2012
601	31616	Fecal Coliform	30D Conc	200	245.	8/1/2011
601	31616	Fecal Coliform	30D Conc	200	560.	9/1/2011
601	31616	Fecal Coliform	1D Conc	400	560.	9/7/2011
601	31616	Fecal Coliform	30D Conc	200	540.	10/1/2011
601	31616	Fecal Coliform	1D Conc	400	540.	10/3/2011
604	00530	Total Suspended Solids	30D Conc	30	36.	1/1/2011
604	00530	Total Suspended Solids	30D Conc	30	36.	5/1/2011
605	00550	Oil and Grease, Total	30D Conc	2.5	4.	9/1/2010
605	00550	Oil and Grease, Total	30D Conc	2.5	20.	12/1/2010

605	00550	Oil and Grease, Total	1D Conc	10	20.	12/21/2010
605	00550	Oil and Grease, Total	30D Conc	2.5	5.	2/1/2011
605	00550	Oil and Grease, Total	30D Conc	2.5	7.	4/1/2011
605	00550	Oil and Grease, Total	30D Conc	2.5	6.	6/1/2011
605	00550	Oil and Grease, Total	30D Conc	2.5	8.	10/1/2011

The DMRs show excessive use of Data Substitution Codes (A-Codes) for flow, odor, suspended solids, turbidity, and oil and grease because the data was not provided to Clean Streams Inc. This is not acceptable. Data must be reported on the DMRs in accordance with your NPDES permit. The misuse of Data Substitution Codes is a violation of the NPDES permit.

This office has not received written notification for exceedances of the daily maximum discharge limits. Part III, Section 12 of your NPDES permit requires you to report, noncompliance that is the result of any violation of a daily maximum discharge limit. You may report noncompliance to the Northeast District Office e-mail account [nedo24hournpdes@epa.state.oh.us](mailto:nedo24hournpdes@epa.state.oh.us). A noncompliance report shall be attached to the e-mail. A noncompliance report form is available on the following web site: <http://www.epa.ohio.gov/dsw/permits/permits.aspx>.

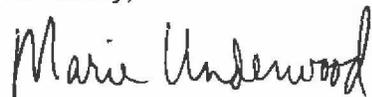
Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code, Chapter 6111.

A review of the Storm Water Pollution Prevention Plan revealed that the plan must be signed and certified by a responsible corporate officer in accordance with Chapter 40, Section 122.22 of the Federal Code of Regulations. The plan must also contain documentation that the proper employees have received periodic training as outlined in the plan.

Within 10 days of the date of this letter, you are directed 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 concerning this letter, please contact this writer at (330) 963-1183.

Sincerely,



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

MU/cs

Enclosure: ORC Notification Form