



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

August 8, 2012

**Re:** Perry County  
Ludowici Roof Tile, Inc.  
Compliance Evaluation Inspection  
NPDES Permit 01N00055\*DD  
Correspondence (IWW)

Mr. Derek Thomas, Plant Manager  
Ludowici Roof Tile, Inc.  
P.O. Box 69  
4757 Tile Plant Road  
New Lexington, Ohio 43764

Dear Mr. Thomas:

On July 25, 2012, I conducted a Compliance Evaluation Inspection of the Ludowici Roof Tile, Inc. facility, located in New Lexington, Ohio. Brad Smith represented Ludowici Roof Tile, Inc. and accompanied me during the inspection. The purpose of the inspection was to determine Ludowici Roof Tile's compliance with NPDES Permit Number 01N00055\*DD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

At the time of my inspection, the final effluent discharge was low but appeared to be visually clear. As a result of the inspection and review of our files, I have the following comments:

1. Part III, Item 3(A) of the permit, which states that "All wastewater treatment works shall be operated in a manner consistent with the following: At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit." At the time of the inspection, I noticed the following:
  - **The wastewater treatment plant flows at outfall 002 are determined utilizing plant process water estimates and a plant well water meter. Influent pump run-time meters are a more effective method of determining flows.**
  - **At the time of the inspection, the aeration blowers were not in operation. I was informed the aerators are operated on a timer and set to run for a half hour every two (2) hours. During the inspection, the aeration was turned on. The water in the aeration tanks was septic. One of the two (2) tanks was black in color while the other tank was black-brown in color. These tanks are not getting enough aeration.**

- **Both clarifier weir boxes had weeds and solid material in them, and must be cleaned.**
  - **The two sand filters were full of weeds, and needed to be cleaned.**
2. The plant process water batch treatment system (outfall 003) was observed, but was not operating. It has not been utilized since 2007, due to a process water re-use system being implemented.
  3. The storage area for clay was observed, near the fire water tank on the hill behind the plant. This area is currently being expanded to allow for greater storage. The renewal NPDES permit will address this area.
  4. A review of the Discharge Monitoring Reports for the period May 2011 through April 2012, showed the following effluent limitation violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2011	002	00400	pH	1D Conc	6.5	5.7	8/29/2011
Sept. 2011	002	00400	pH	1D Conc	6.5	5.6	9/1/2011
Sept. 2011	002	00400	pH	1D Conc	6.5	5.8	9/6/2011
Sept. 2011	002	00400	pH	1D Conc	6.5	5.8	9/12/2011
Dec. 2011	002	00530	Total Suspended Solids	30D Conc	12	15.	12/1/2011

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

If you have not already done so, please inform this office, in writing, within ten days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Attached is a copy of the inspection report which indicates marginal and/or unsatisfactory evaluations of the following areas: Operations & Maintenance. I gave this rating because of the deficiencies mentioned in the above comments. Ludowici Roof Tile, Inc. must take the appropriate actions to return the facility to compliance with all terms and conditions of the NPDES permit.

Please respond to this letter by August 22, 2012.

If you have any questions, please contact me at (740) 380-5218.

Sincerely,

A handwritten signature in cursive script that reads "Dan Messerly".

Dan Messerly  
District Representative  
Division of Surface Water

DM/dh

Enclosure

c: Jerry Smith, Buckeye Environmental Services



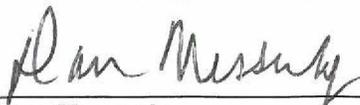
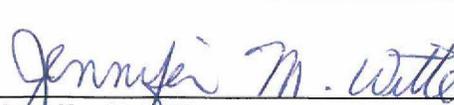
State of Ohio Environmental Protection Agency  
Southeast District Office

Industrial NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
01N00055*DD	OH0004570	July 25, 2012	C	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Ludowici Roof Tile, Inc. 4757 Tile Plant Road New Lexington, Ohio		1:00 p.m.	August 1, 2010
		Exit Time	Permit Expiration Date
		3:15 p.m.	October 31, 2011
Name(s) and Title(s) of On-Site Representative(s)		Phone Number(s)	
Brad Smith, Project Engineer II		(740) 342-1995	
Name, Address, and Title of Responsible Official		Phone Number	
Derek Thomas, Plant Manager Ludowici Roof Tile, Inc. P.O. Box 69 New Lexington, Ohio 43764		(740) 342-1995	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)					
S	Permit	M	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	Compliance Schedules
U	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		Other
S	Collection System				

Section D: Summary of Findings (attach additional sheets if necessary)			
Trash trap is pumped by AGree Septic and hauled to Lancaster WWTP. Buckeye Environmental Services (Jerry Smith) takes all samples and transports them to TCCI Labs in New Lexington in a cooler for analysis. All analyses done by TCCI. Temp, D.O., and pH analysis should be done on-site, and a log book for instrument calibration maintained.			
Inspector		Reviewer	
			
Date		Date	
8/7/12		8/7/12	
Dan Messerly Division of Surface Water Southeast District Office		Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	