



**Environmental
Protection Agency**

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

August 13, 2012

RE: NPDES PERMIT NO. 3GN00014
EYE LIGHTING INTERNATIONAL OF NORTH AMERICA INC.
9150 HENDRICKS ROAD
MENTOR, LAKE COUNTY
INDUSTRIAL

Mr. Harry West
Director of Operations
Eye Lighting International of North America, Inc.
9150 Hendricks Road
Mentor OH 44060

Dear Mr. West:

On August 7, 2012, this writer conducted a compliance evaluation inspection of the wastewater treatment system serving the above referenced facility. The purpose of the inspection was to evaluate the wastewater treatment system's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit. Mr. Vlado Fedoran accompanied this writer during the inspection.

Eye Lighting International of North America, Inc. produces arc tubes that are used in street lights and stadium lights. Previously, wastewater discharged from the facility was noncontact cooling water (NCCW). The water source for the NCCW is city water. The NCCW is used to cool a heater that melts glass. No additives are used in NCCW system.

In March 2011, the facility stopped discharging to waters of the state. The outdoor NCCW collection tank discharge line has been replaced with a screw plug. Any discharge from the NCCW system is now directed to sanitary sewers. In a subsequent telephone conversation with Mr. Fedoran on August 10, 2012, this writer learned that a more permanent sealing of the former discharge location has been installed. Mr. Fedoran stated that the screw plug has been glued to the tank and covered with a cap. This writer informed Mr. Fedoran that if the NCCW tank must be drained for cleaning, the water must be directed to the sanitary sewer or hauled to a wastewater treatment facility.

A review of the Discharge Monitoring Reports (DMRs) covering the period of October 2010 through July 2012 revealed no effluent limitation violations. However, a review of the DMRs for the months of October 2010, November 2010, December 2010, January 2011 and February 2011 show that reporting code 50050 may have been incorrectly used for Chlorine, Total Residual. The correct code for Chlorine, Total Residual is 50060. Please make any necessary corrections to the DMRs for these months.

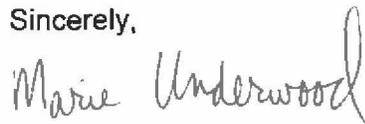
In addition, no data was provided for Total Residual Oxidants (TRO) on January 31, 2011 and February 28, 2011, yet a flow discharge value was reported. This is a frequency violation for the monitoring of TRO. TRO must be reported when there is a discharge to waters of the state.

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 pursuant to the Ohio Revised Code Chapter 6111.

Because Eye Lighting International is no longer discharging to waters of the state, a Notice of Termination (NOT) form must be submitted to the Columbus Office of Ohio EPA. The submission of an NOT form constitutes notice that Eye Lighting International is no longer authorized to discharge into waters of the state under the NPDES general permit program. This writer presented an NOT form to Mr. Fedoran on the day of inspection. The NOT form can also be found on the Division of Surface Water website at www.epa.gov/dsw.

Should you have questions or comments regarding this letter, 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