



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

October 31, 2012

RE: GABRIEL PERFORMANCE PRODUCTS
ASHTABULA STATE ROAD FACILITY
NPDES PERMIT NO. 31F00002*JD
ASHTABULA TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Tyce Workman, Environmental Manager
Gabriel Performance Products, LLC
725 State Road
Ashtabula, Ohio 44004

Dear Mr. Workman:

On October 29, 2012, a site inspection was conducted at the above referenced facility at 725 State Road, Ashtabula Township, Ashtabula County. John Schmidt, Sara Hise, Eric Nygaard, and Jacob Howdysshell represented Ohio EPA's Division of Surface Water (DSW) during the inspection. Tyce Workman and Andy Balazs, represented Gabriel Performance Products, LLC (Gabriel) 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 and in conjunction with renewal of the NPDES permit. The last compliance inspection was conducted on December 20, 2011.

The plant primarily produces specialty chemicals for the pharmaceutical petroleum, aerospace and other industries on a small batch-basis through a combination of blending, reacting, heating, distilling, drying, filtering, and packaging. The wastewater system consists of the following industrial processes and discharges (see attached figure):

Industrial Wastewater Treatment

Process wastewater is generated from Gabriel's plant sanitary waste package plant, boiler blow down and gas scrubbers, floor drains in process areas, cooling towers, salt scrubbers, and general plant housekeeping. Waste streams from the cooling towers, salt scrubber, and general plant housekeeping receive pH adjustment in the west pit by the addition of HCl and caustic prior to discharge to the north rain sump. All remaining plant waste except collected storm water and ground water are also collected by the North rain sump and are discharged into the North and South ponds for flow equalization and settling. Waste from the flow equalization ponds receive pH adjustment through HCl and caustic addition as necessary, multi-media sand filtration, air stripping and carbon treatment. Flows are metered prior to discharge as Outfall 001. Solids are separated in the multi-media filtration system. Outfall 001 is located at the outfall of the carbon treatment system before the wastewater is conveyed through a pipe to a manhole located along the fence at the southeastern corner of the plant just north of an adjacent railroad. Final discharge is to the Diamond Shamrock tributary west of the State Road culvert. Total flow varies, but is about 30 million gallons per year. Sludge dewatering is accomplished through a filter press, with sludge disposed of at a commercial solid waste landfill.

Sanitary Wastewater Treatment Plant

There is one sanitary wastewater treatment plant (WWTP) that serves domestic sewage production from the facility. Wastewater from sanitary sources is treated through an equalization tank, trash trap, extended aeration facility, surface sand filtration, and tablet dechlorination prior to discharge as to a manhole as Outfall 601. The package plant discharges to the North-South equalization and settling ponds is further treated with remaining plant waste as described under industrial wastewater treatment.

Curtain Drain (Ground Water Treatment) Wastewater Treatment

Volatile organic compound (VOC) laden ground water is intercepted along the entire perimeter of the facility via a slurry wall and curtain drain and is collected in the T501 sump. The collected wastewater undergoes air stripping, multimedia filtration, with provisions for additional air stripping, and carbon treatment if needed. The discharge joins remaining plant wastewater discharges as Outfall 001.

Storm Water Treatment

All storm water within the facility is collected via a series of yard drains and drainage channels and conveyed to a 30,000-gallon retention tank prior to discharge to the North-South settling ponds and is further treated as described under industrial wastewater treatment.

Observations and Notations

Following are observations and notations made during the inspection:

Sanitary WWTP

1. The sanitary package plant is rated at 2,000 gpd. Dennis Woodard is the primary operator of record. The plant was operating and discharging at the time of the inspection. The facility is fitted with alarms.
2. The plant is operated by Dennis Woodard, employee of Gabriel. A copy of the log book, NPDES permit, and Operations and Maintenance manuals were available, and found compliant with OAC 3745-7-09. Gabriel personnel perform routine observations of pH, odor, color, turbidity, and flow, monitor the facility, and perform the sampling. Remaining samples are collected by Gabriel staff and are analyzed by EA Group. Tyce Workman or Andy Balazs, under supervision of Tyce Workman, prepares the electronic discharge monitoring report (eDMR) and Mr. Workman submits of the eDMR through Ohio EPA's Web-based application. In the future Mr. Balazs may submit the eDMR, which will require Mr. Balazs to obtain a separate eDMR account to submit this information.
3. The extended aeration system was noted as dark brown with a musty odor. The blowers were running at the time of the inspection. The air did not appear to be evenly distributed across the tank, and may be an indication of a plugged, leaking, or broken air line. The source should be investigated and corrected as soon as possible.
4. The clarifier was found in acceptable condition. Return sludge lines were operable.
5. The surface sand filter dosing pumps could not be cycled during the inspection, although the pup self-activated during the inspection. Gabriel must have the ability to manually check pumps to assure that they operate properly. The alarm could also not be tested.
6. Examination of the inoperable float for the sand filter dosing pumps indicate that these may be old mercury float switches, and could be a source of elevated mercury levels in Outfall 601. If the switches are found to contain mercury, they should be replaced with non-mercury floats.

7. The media in the surface sand filters were replaced in September 2011. The beds were not even and some sludge was noted on the beds. Water discharged to the bed was noted as clear but still contained a musty odor. There continues to be some scouring noted in the sand bed at the edge of the concrete pads. Sand must be spread so that sand flows evenly over the entire surface of the sand bed. Consideration should be given to providing some stone rip-rap on the pads to keep the sand from scouring and causing the sand beds to short circuit.
8. The chlorination and dechlorination tanks were stocked with chemicals and operating properly. The post-disinfection aeration system was also operating properly.
9. The discharge at Outfall 601 appeared to be of a satisfactory visual quality.

Industrial WWTP

10. Gabriel obtained approvals on August 12, 2011 and June 8, 2011 for changes to water conditioning chemicals used in boiler operations. No changes in processes were noted since the December 2011 inspection.
11. The general operation and maintenance of the air stripping, multi-media filtration, and carbon treatment systems appeared to be satisfactory. Media in the multi-media filter and carbon units are replaced on an as-needed basis.
12. The general operation of process wastewater sumps, equalization ponds, and chemical neutralization systems appeared satisfactory. The equalization ponds are lined with high-density polyethylene (HDPE) and appeared in good condition. A leak was noted in the influent piping to the north pond that should be corrected immediately. Sludge removal was discussed, and occurs annually to every other year.
13. Final outfall composite sampler was collecting composite samples, however Gabriel could not verify if the composite samples are collected on a time-proportional or flow-proportional basis. Composite samples must be collected on a flow proportional basis as specified in your NPDES permit Part II-K. Samples are maintained at the proper temperature.
14. Gabriel personnel perform routine observations, monitor the facility, and perform the sampling. Water temperature, pH, and flow data are collected by Gabriel staff. Analytical samples are collected by Gabriel staff and are analyzed by EA Group. Tyce Workman or Andy Balazs, under supervision of Tyce Workman, prepares the electronic discharge monitoring report (eDMR) and Mr. Workman submits of the eDMR through Ohio EPA's Web-based application. In the future Mr. Balazs may submit the eDMR, which will require Mr. Balazs to obtain a separate eDMR account to submit this information.
15. The storm water pollution prevention plan (SWPPP) was updated on December 7, 2011. The annual site certification was completed on December 19, 2011, and the inspection also completed on December 19, 2011. Employee training on the SWPPP occurred on March 16, 2012.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2011 through October 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00310	Biochemical Oxygen Demand	1D Conc	29.6	35.	12/22/2011
001	00400	pH	1D Conc	6.5	6.4	9/13/2012

Gabriel provided an explanation as to the potential sources of the violation and measures to ensure that it will not be repeated in correspondence to Ohio EPA on January 10, 2012 and February 28, 2012. No additional information is needed to respond to the violation. Ohio EPA did not receive a noncompliance notification for the pH excursion in September. A written explanation as to why the event occurred must be provided, along with measures to ensure that it will not be repeated. Noncompliance notification forms may be found at: epa.ohio.gov/portals/35/permits/24-hour-reporting-Form4498-bypasses.doc.

Reporting Code Violations

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

Reporting Frequency Violations

Ohio EPA notes that June 2012 bacteria sampling was actually collected in early July. Gabriel provided an explanation as to the potential sources of the violation and measures to ensure that it will not be repeated in notes in the eDMR. No additional information is needed to respond to the violation.

Compliance Schedule

The current permit does not contain a compliance schedule, although Gabriel does have milestones associated with its mercury variance.

Other Violations

1. Composite Sample Collection: Part II, Item J of your NPDES permit requires that composite samples be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the wastewater flow rate at the time of sampling. Such samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance. It appears that Gabriel is currently collecting time-proportional samples. Samplers must be reprogrammed to collect flow-proportional samples.
2. NPDES Permit Renewal: Your current NPDES permit application expires on January 31, 2013. Gabriel was notified of its obligations to submit a renew application to its NPDES on April 2, 2012. Ohio Administrative Code (OAC) Rule 3745-33-03(B) requires that the NPDES renewal application be submitted to Ohio EPA at least 180 days prior to the expiration of the current permit (August 4, 2012). Ohio EPA received the application on October 15, 2012. During the inspection, Ohio EPA discussed deficiencies with the application. Please submit revisions to your application as soon as possible.
3. Mercury Variance: Pursuant to Part II, Item Z of your NPDES permit, Gabriel was required to submit a request to renew the mercury variance in conjunction with the NPDES renewal application. The following information must be included with the submittal of the NPDES permit renewal application: a) the certification described under Part II, Item AA.1.h. of your NPDES permit, and all information required under Part II, Item AA.1.h.i. through Part II, Item AA.1.h.iii; b) a status report on the progress being made implementing the pollutant minimization program (PMP). This information may be included in the annual PMP report required under Part II, Item AA.1.g of your NPDES permit; and c) a listing of the strategies

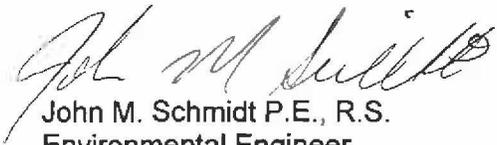
and/or programs in the PMP which will be continued under the next renewal of this permit; and a statement requesting the renewal of the mercury variance. Please submit this additional information and request as soon as possible.

Comments

During the inspection, Gabriel discussed plans for installing a recycling system for its industrial process wastewater, as well as connecting its sanitary discharge to the city of Ashtabula WWTP. The installation of any additional components or piping will require a permit-to-install (PTI) application, as well as modification of your NPDES permit.

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

ec: Sara Hise, Ohio EPA, DSW, CO
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File: Industrial/Gabriel Performance Products/PC

