



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

November 6, 2012

RE: ESAB WELDING & CUTTING PRODUCTS
OHIO EPA PERMIT 3IC00071
ASHTABULA TWP., ASHTABULA COUNTY
LIMITED SCOPE COMPLIANCE EVALUATION

NOTICE OF VIOLATION

Mr. Dale Piccirillo, Plant EHS Manager
The ESAB Group, Inc.
ESAB Welding and Cutting Products
3325 Middle Road
Ashtabula, OH 44004

Dear Mr. Johnson:

On November 5, 2012, a limited scope site inspection and reconnaissance visit was conducted at the above referenced facility at 3325 Middle Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt, Jacob Howdyshell, and Sara Hise of Ohio EPA. Dale Piccirillo represented The ESAB Group, Inc. / ESAB Welding and Cutting Products (ESAB) during the inspection. The purpose of the inspection was to familiarize our central office staff with operations and to obtain an update as to the shut-down of this facility. Issues were raised with the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on April 26, 2012.

Industrial Waste Water treatment

Ohio EPA notes that the system consists of a treatment system for wire drawing and metal finishing, specifically carbon steel and alloy steel welding wires. Wastewater from various production lines and floor drains discharge to a series of sumps throughout the plant. Some sumps are pumped while others are manually collected in plastic totes.

Prior to July 31, 2012, waste pickle liquor is pumped to 10,000-gallon tank, with a 100,000-gallon equalization tank used for excess volumes, The 10,000 waste pickle liquor tank discharges to a 47,000-gallon wet well (90 pit) for further treatment. Copper-containing wastes are collected portable totes from the sumps and manually discharged to a 2,500-gallon holding/equalization tank, then flows to a wet well (90 pit). Contact cooling water, boiler blow-down lines, and filtrate lines from the sludge pressing operations also discharge to a 47,000-gallon wet well (90 pit).

Wastes collected in the wet well (90 pit) flow to a three stage chemical mixing operation to adjust the pH. Each tank in the process is 7,000 gallons. Each stage can be bypassed as needed for operations and maintenance. Stage 1 tank receives influent from the 90 pit, sludge from the clarifier, and sludge from the sludge holding tank, and is mechanically mixed. Caustic soda and air is added. Stage 2 tank receives influent from Stage 1 tank via gravity and adds caustic soda, air, and sodium Dimethyl dicarbonate are mechanically mixed to aid in settling of inorganic compounds (metals), specifically copper and raises the pH to approximately 3.0. Stage 3 tank receives influent from Stage

2 tank via gravity and adds caustic soda until a slurry is created and raises the pH to approximately 5.5. Stage 3 then flows into one of two rapid-mix flocculator tanks. Polymer is added to these tanks and mechanically mixed. The slurry then flows to the Lamella (plate) clarifiers. Treated effluent flows from the clarifiers to a discharge line to a manhole where flow is monitored and samples collected with an ISCO sampler as Outfall 602. The manhole discharges to a receiving ditch.

Sludge is pumped from the clarifiers to a 10,000-gallon sludge holding tank. Sludge is then pumped through a plate and frame filter press. Filtrate flows by gravity back to the 90 pit at the treatment headworks. Pressed sludge drops into a sealed roll-off dumpster for characterization and off-site disposal. Nonhazardous sludge is taken to a solid waste disposal facility, and materials determined hazardous are taken to a hazardous waste treatment, storage, and disposal facility. Nonhazardous sludge is taken to the Geneva Landfill, a licensed solid waste disposal facility, and materials unable to be disposed of as a solid waste are hauled to a licensed hazardous waste treatment, storage and disposal facility.

Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility, as well as storm water runoff from the adjacent ASTHA Chemical plant and Millennium Chemical Plant, located east and south of the ESAB facility respectively. Storm water is collected and discharged to ditches around the perimeter of the facility and is collected in a storm water pond located northwest of the manufacturing building. Materials are all managed under roof except for sealed roll-off boxes. When boxes are emptied, collected storm water within the boxes is collected and drained to the wastewater collection system.

Plant Sanitary Waste Water Treatment:

Plant sanitary wastes are conveyed to EMC Metals (former Elkem Metals) sanitary wastewater plant located north of the ESAB facility for treatment and are not a part of this NPDES permit.

Observations

The following observations were made during the inspection:

1. ESAB is in the process of winding down operations at this facility. The facility ceased operations on July 31, 2012. The facility is currently in the process of cleaning process areas and providing treatment on an as-needed basis in batches. The facility currently has two employees. ESAB anticipates ceasing wastewater treatment operations at this location altogether in the first quarter of 2013.
2. The wastewater treatment system was not in operation during the site visit and was not examined as a part of this inspection.
3. The design flow of the chemical wastewater treatment plant (WWTP) is 98,200 gpd and peak flow remains is 150,000 gpd. Current flow rates when operating have ranged from 8,000 gpd to 25,000 gpd, down from the 26,000 gpd prior to July 31, 2012 and down from the 40,000 gpd noted in the 2011 inspection
4. A copper recycling system utilizes two 500-gallon tanks that have a backflow to additional tanks that could overflow into floor drains.
5. A log book of repairs and observations is maintained at the WWTP and in Mr. Piccirillo's office electronically. Mr. Piccirillo performs routine operations at the WWTP, monitors the

facility, and performs the sampling. Mr. Piccirillo also prepares the electronic discharge monitoring report (eDMR) and you submit of the eDMR through Ohio EPA's Web-based application.

6. pH meters are calibrated weekly.
7. The contractor was cleaning out the surface water channel to the west of the ESAB manufacturing building and upstream of Outfall 602 and 002. Water in the surface water channel upstream of the contractor work area was found to be discharging to the woods via a pump and fire hose. Upon discovery, Mr. Piccirillo shut off the pump and notified the contractor that this was prohibited per ESAB's NPDES permit.
8. The wastewater plant discharge (Station 602) was to be routed through a fire hose parallel to the west surface water channel and discharging downstream of Final Outfall 002. Mr. Piccirillo was informed that this was prohibited per ESAB's NPDES permit, and Mr. Piccirillo notified the contractor to relocate the discharge location to the surface water discharge channel upstream of Outfall 002.
9. No evidence of discharges was noted from the roll-off box storage area.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports received by Ohio EPA for the period March 1, 2012 through October 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	01042	Copper, Total (Cu)	30D Conc	882	934.	5/1/2012
002	50092	Mercury, Total (Low Level)	30D Conc	30.3	32.8	6/1/2012
002	50092	Mercury, Total (Low Level)	30D Conc	30.3	188.	7/1/2012
002	01119	Copper, Total Recoverable)	1D Conc	38	99.4	7/5/2012
002	01119	Copper, Total Recoverable)	1D Conc	38	136.	8/2/2012
002	50092	Mercury, Total (Low Level)	30D Conc	30.3	83.4	9/1/2012

Written explanations as to why mercury violations occurred were provided to Ohio EPA via correspondence dated May 23, 2012, June 25, 2012, July 24, 2012, August 30, 2012, and September 26, 2012. Ohio EPA notes that ESAB modified its NPDES permit to change the mercury limits pursuant to a mercury variance request, which became effective September 1, 2011. ESAB is currently removing accumulated sediments from the west surface water ditch to abate the copper violations. No additional response is required at this time to address these effluent violations.

Reporting Violations

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

Compliance Schedule Violations

The following compliance schedule obligations were noted for the reporting period reviewed:

App No	Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
3IC00071	9/01/2011	07/31/12	03/01/2012	2/20/2012	---	Report	Hg Water & Rainfall
3IC00071	9/01/2011	07/31/12	03/01/2012	2/20/2012	---	Report	Off-Site & Area Hg
3IC00071	9/01/2011	07/31/12	09/01/2012	Incomplete	---	Report	Hg Reduction Report

Completed milestones were met within the prescribed times. It is unclear if the February 20, 2012 report also serves as the mercury reduction report of if this information is forthcoming. Please clarify this information.

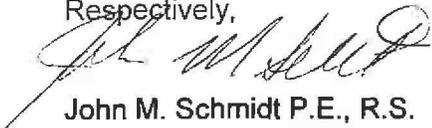
Other Violations

During the course of the inspection, the surface water described by Mr. Piccirillo as clean (~ 20 ng/l of Hg) was being diverted from the west surface water ditch into the woods west of the ESAB facility. This is considered by Ohio EPA to be an illegal discharge, as ESAB's mercury variance and NPDES permit require all flow be routed through Outfall 002. The flow from the outfall of the industrial WWTP (Outfall 602) was found to be plumbed to the pipe downstream of Outfall 002. This is also considered by Ohio EPA to be an illegal discharge, as ESAB's mercury variance and NPDES permit require all flow be routed through Outfall 002. Please provide a report that summarizes the estimated volumes and duration of illegal discharges.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

File: Industrial/ESAB Group, Inc./pc

