



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

December 11, 2012

RE: RESERVE ENVIRONMENTAL SERVICES
OHIO EPA PERMIT 3IN00145
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Yogi Chokshi, President
Reserve Environmental Services, Inc.
4633 Middle Road
Ashtabula, OH 44004

Dear Mr. Chokshi:

On December 10, 2012, a site inspection was conducted at the above referenced facility at 4633 Middle Road, Ashtabula Township, Ashtabula County. John Schmidt represented Ohio EPA during the inspection. Bernie Roskovics represented Reserve Environmental Services, Inc. (RES) 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 for the areas examined. The last compliance inspection was conducted on January 31, 2012.

Prior to the inspection Mandy Razzano and Paul Anderson, representing Ohio EPA, verified a grab sample location for Outfall 006. Mr. Roskovics indicated that due to shut down for the weekend and process time for incoming loads, the microfiltration unit (MFU) process would not be operating today, and that typically Wednesdays and Thursdays are better days to ensure operation of the MFU unit. Due to a lack of sample to obtain, Ms. Razzano and Mr. Anderson left the site. Following the inspection, we spoke briefly with Lisa Specht.

Wastewater treatment consists of separate systems for hazardous and nonhazardous liquid wastes, contaminated ground water, and leachate from both active and inactive disposal units, sanitary wastes, and storm water. Wastewater schematics revised by RES on November 10, 2010, were provided to Ohio EPA and are attached. The schematics were confirmed with RES personnel as current.

Observations and Notations

Ground Water Treatment System

The treatment process is identified as the Free Liquid Treatment Facility (FLTF). Ground water is treated by chemical precipitation, sedimentation (settling) and neutralization (pH adjustment), air stripping, and carbon absorption for discharge to an unnamed tributary to Whitman Creek as final Outfall 001. Sludge is processed through a plate filter press, where it is removed for off-site disposal. The plant operates in batches as needed, with the amount of ground water to treat depending upon local hydrologic conditions. The design of the plant is 2,000 gpd (0.002 MGD). The plant was not operating at the time of the inspection, due to a broken tank support. The process was

last operated the week of October 8, 2012. This treatment unit must be placed back into operation as soon as possible to prevent backup of contaminated ground water in the collection system.

RCRA C Landfill Leachate (Sites C, D, and E) Treatment System (LaBounty Road)

Leachate from inactive RCRA disposal sites (Sites C, D, and E) are treated by chemical precipitation (lime, hydrogen sulfide), sedimentation (settling) and neutralization (pH adjustment) prior to an unnamed tributary to Whitman's Creek as Outfall 001. Sludge is processed through a plate filter press, where it is removed for off-site disposal. The plant operates in batches as needed, with the amount of ground water to treat depending upon local hydrologic conditions. The design flow of the plant is 3,000 gpd (0.003 MGD). The process was last operated the week of October 8, 2012. This treatment unit must be placed back into operation as soon as possible to prevent backup in the leachate collection system.

Liquid Wastes Treatment System (Middle Rd)

Hazardous/nonhazardous liquid wastes, as well as storm water within exposed process areas of the central waste treatment are treated by micro-straining, chemical precipitation, sedimentation (settling) neutralization (pH adjustment) activated carbon, and microfiltration, passing through an internal outfall (Outfall 604) prior to final discharge to Lake Erie at Outfall 006. A process flow map is attached. Sludge is processed through a plate filter press, where it is removed for disposal in an onsite landfill (Site B). The plant operates in batches as needed, with the amount treated depending upon the receipt of wastes in tanker trucks, as well as precipitation events for portions of the treatment system storm water that is directed to the treatment system. The MFU building contained a strong ammonia odor that made inspection difficult. While some repairs to pipe supports had been made from the last inspection, the steel frame supports for tanks and pipes in the MFU process are still noted a severely corroded and is also corroding the cement floor around the MFU unit. RES has obtained the structural steel for necessary repairs, but has not yet implemented the repairs according to the schedule submitted in the March 21, 2012 RES response letter. The North MFU unit supply tank has been repaired and the access ladder replaced. The MFU unit was not operating during the inspection and there was no discharge through Outfalls 604 or 006.

RCRA D Landfill Leachate Treatment (Site B)

Landfill leachate is collected in a leachate pond and combined in a settling pond, where it is pumped to the final tank No. 1 in the microfiltration unit (MFU) building. It is comingled with the effluent from the MFU in the final settling tank prior to being monitored as internal monitoring point Station 604. The damaged line noted in the January 2012 inspection was permanently repaired on April 7, 2012.

An inspection of the leachate pond and storm pond noted that the pump is affixed to a floating dock tethered to the shore. Mr. Roskovics offered as an explanation for the noncompliance for total suspended solids that, in periods of low flow, the pump may come into contact with the muck at the bottom of the pond. The pump was not operating at the time of the inspection due to low flow. RES will have to investigate measures to ensure that the pump does not come into contact with the muck in the bottom of the pond, perhaps by placing the pump on a pole or constructing a sump for the pump, which will require a Permit-To-Install (PTI). In the March 21, 2012 letter, RES stated that they would add an in-line filter sock to remove excess TSS by April 2012. Please verify if this activity has been completed. During the inspection, Ohio EPA recommended that the line segment damaged last year between the leachate pond/storm pond and the MFU building be marked to ensure that the line is not struck again. Leachate undergoes preliminary settling only in the leachate pond and storm pond areas, where it is then pumped to the final tank in the MFU building just prior to Outfall 604. RES contends that this treatment is adequate. Ohio EPA and U.S. EPA are reviewing the treatability study for the leachate to ascertain the appropriate treatment level required for this waste stream prior to discharge through Outfall 006.

Plant Sanitary Wastes Treatment System

Plant sanitary wastes are treated by an activated sludge treatment, slow sand filtration, and chlorination disinfection prior to discharge to the Middle Road ditch to an unnamed tributary of Whitman Creek as Outfall 003. An internal monitoring station for the sanitary WWTP is monitored as Station 603. Sludge is removed from the clarifier on an as-needed basis and hauled to another POTW. The design flow of the extended aeration plant is 5,700 gpd, although current flow is only a few hundred gallons per day. Upon inspection, the plant was turned off and was restarted for the inspection. Upon bringing the plant back into service, the aeration tank contents had a light brown colored sludge with no odor that is well aerated with moderate foaming. Records of repairs and observations of flow, color, odor, and turbidity are maintained by RES through a bound log book. Lisa Specht submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Plant personnel perform daily sampling and operations at the WWTP. The clarifier was observed in acceptable working order. The RAS line and skimmer was functional. The clarifier was clear and weirs reasonably clean. RES personnel stated that weirs are cleaned twice weekly. The dosing pumps were cycled and found operable, with a clear discharge noted to the sand filters. The alarm could not be tested. No sludge and minimal vegetation was noted in the sand beds. The skimmer and return sludge lines were observed in operational condition. Sludge is removed from the system periodically. The chlorine contact tank was not examined as it was outside the disinfection season. The final discharge to the ditch north of the Outfall 003 pond was found to be discharging of satisfactory visual quality.

Storm Water Treatment

Storm water from the western process area haul roads and parking areas are treated through a sedimentation pond located at the southwest corner of the property along Middle Road, and discharged to the Middle Road ditch at the southeast corner of the property as Outfall 003. Storm water from south end of inactive lagoons 3, 4, 5, and 6 are treated through a sedimentation pond prior to discharge to the Middle Road ditch located at the southwest corner of the intersection of Middle Road and LaBounty Road as Outfall 004. Storm water from north end of inactive lagoons 3, 4, 5, and 6 are treated through a sedimentation pond prior to discharge to another unnamed tributary to Whitman Creek located at the north of Ponds 3-6 as Outfall 005. Storm water from inactive hazardous waste disposal units (Sites C, D, E) located east of LaBounty Road are treated through a series of sedimentation ponds prior to discharge as Outfall 007.

Drag-out of sludge from the sludge loading areas from the CWT sludge press into the outside paved areas adjacent to the RES office was noted by Ohio EPA, allowing precipitation to form leachate and allowing that leachate to be discharged to Pond 003. Sludge drag-out must be controlled through better housekeeping practices. Sludge press sections were being stored in the parking lot west of the sludge loading area, with new sections uncovered and used sections now covered.

The aerator for the sedimentation basin for Outfall 003 was observed to be in operation at the time of the inspection. Between October and November 2012, RES had Koski Construction clear discharge ditches of sediment and phragmites, resulting in a free flow discharge at Outfalls 003, 004, and 005. Outfalls 003 and Outfall 004 were discharging a flow of acceptable visual quality. Outfall 005 was observed as not discharging due to a lack of flow.

Silt fencing north of the MFU building has been repaired, with sediment and flyash from the ponds north of the MFU building noted in the January 2012 inspection removed. Straw bales were noted as sediment controls for yard drains collecting storm water runoff to keep piping from becoming plugged. Please note that straw bales are not acceptable as a control mechanism. Other control mechanisms are available as indicated through Ohio EPA guidance, and was discussed during the inspection.

Outfall 007 north of Outfall 001 was observed as discharging effluent of an acceptable visual quality.

The storm water pollution prevention plan (SWPPP) was substantially revised based upon comments provided by both U.S. EPA and Ohio EPA during inspections conducted in 2011. The plan was revised in November 2011 with the plan re-examined in 2012 and determined that no additional changes were needed by RES personnel. Training on the plan was conducted on March 7, 2012 as well as November 20-30, 2012 and December 5, 2012. The annual inspection and certification was conducted and completed on November 18, 2012.

NPDES Permit Compliance Review

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

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01114	Lead, Total Recoverable)	30D Conc	9.9	10.2	1/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	20.9	1/1/2012
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00001	1/1/2012
604	00530	Total Suspended Solids	30D Qty	6.69	12.4254	1/1/2012
604	00530	Total Suspended Solids	1D Qty	12.94	14.5457	1/5/2012
604	00530	Total Suspended Solids	1D Qty	12.94	13.5007	1/12/2012
604	00530	Total Suspended Solids	1D Qty	12.94	15.1911	1/19/2012
001	01114	Lead, Total Recoverable	30D Conc	9.9	24.2	2/1/2012
001	01114	Lead, Total Recoverable	30D Qty	0.0001	.00038	2/1/2012
001	01009	Barium, Total Recoverable	30D Conc	220	496.	2/1/2012
001	01009	Barium, Total Recoverable	30D Qty	0.0042	.00778	2/1/2012
006	00515	Residue, Total Dissolved	30D Conc	33992	34202.5	2/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	4.09	2/1/2012
006	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.	2/1/2012
604	00530	Total Suspended Solids	30D Conc	31	39.75	2/1/2012
604	00530	Total Suspended Solids	30D Qty	6.69	8.4629	2/1/2012
604	00530	Total Suspended Solids	1D Conc	60	64.	2/9/2012
001	01009	Barium, Total Recoverable	30D Conc	220	222.	3/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	7.65	3/1/2012
603	00530	Total Suspended Solids	30D Conc	12	30.	3/1/2012
603	00530	Total Suspended Solids	1D Conc	18	30.	3/28/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	4.03	4/1/2012
604	00530	Total Suspended Solids	30D Conc	31	34.5	4/1/2012
604	00530	Total Suspended Solids	30D Qty	6.69	8.35336	4/1/2012
604	00530	Total Suspended Solids	1D Conc	60	62.	4/26/2012
604	00530	Total Suspended Solids	1D Qty	12.94	13.3832	4/26/2012
001	01009	Barium, Total Recoverable)	30D Conc	220	221.	5/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	1.56	5/1/2012
001	01119	Copper, Total Recoverable	30D Conc	12	34.	6/1/2012
001	01009	Barium, Total Recoverable	30D Conc	220	318.	6/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	4.25	6/1/2012
001	01119	Copper, Total Recoverable	1D Conc	19	34.	6/19/2012
001	01119	Copper, Total Recoverable	30D Conc	12	50	8/1/2012
001	01119	Copper, Total Recoverable	30D Qty	0.0001	.00025	8/1/2012

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006	50092	Mercury, Total (Low Level)	30D Conc	1.3	2.49	8/1/2012
001	01119	Copper, Total Recoverable	1D Conc	19	50.	8/21/2012
001	01119	Copper, Total Recoverable	1D Qty	0.0002	.00025	8/21/2012
001	01119	Copper, Total Recoverable	30D Conc	12	19.	9/1/2012
001	01119	Copper, Total Recoverable	30D Qty	0.0001	.00019	9/1/2012
006	50092	Mercury, Total (Low Level)	30D Conc	1.3	2.81	10/1/2012
006		C Dubia Toxicity		30	36.49	9/1/2012

As RES is aware via an October 24, 2011 letter, RES has been in significant noncompliance (SNC) for total dissolved solids and total suspended solids, and is now in SNC for copper, and remains in SNC for mercury. Suspended solids violations continue as a recurring problem. Ohio EPA acknowledges that a mercury variance application is pending before the agency to address mercury violations. RES has chosen to cease acceptance of the waste stream containing phenol, with the last load accepted on September 16, 2011 from Lord Corp., according to RES records. RES provided an explanation of copper and barium violations due to a concentrated leachate from the dry weather prior to Hurricane Sandy. If RES is unable to meet NPDES permit limits for copper, barium, and/or lead, then RES must submit a PTI to make process improvements to provide adequate treatment of these waste streams.

Reporting Code Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
004	00400	pH			AF	1/21/2012
004	00056	Flow Rate			AF	1/21/2012
004	00095	Specific Conductance a			AF	1/21/2012
005	00400	pH			AF	1/21/2012
005	00056	Flow Rate			AF	1/21/2012
005	00095	Specific Conductance a			AF	1/21/2012
004	00530	Total Suspended Solids			AF	1/28/2012
004	00665	Phosphorus, Total (P)			AF	1/28/2012
004	00400	pH			AF	1/28/2012
004	00056	Flow Rate			AF	1/28/2012
004	00095	Specific Conductance a			AF	1/28/2012
005	00530	Total Suspended Solids			AF	1/28/2012
005	00665	Phosphorus, Total (P)			AF	1/28/2012
005	00400	pH			AF	1/28/2012
005	00056	Flow Rate			AF	1/28/2012
005	00095	Specific Conductance a			AF	1/28/2012
004	00400	pH			AF	3/14/2012
004	00056	Flow Rate			AF	3/14/2012
004	00095	Specific Conductance a			AF	3/14/2012
005	00400	pH			AF	3/14/2012
005	00056	Flow Rate			AF	3/14/2012
005	00095	Specific Conductance a			AF	3/14/2012
004	00400	pH			AF	3/21/2012
004	00056	Flow Rate			AF	3/21/2012
004	00095	Specific Conductance a			AF	3/21/2012
005	00400	pH			AF	3/21/2012
005	00056	Flow Rate			AF	3/21/2012
005	00095	Specific Conductance a			AF	3/21/2012
004	00400	pH			AF	5/7/2012

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004	00056	Flow Rate	AF	5/7/2012
004	00095	Specific Conductance a	AF	5/7/2012
005	00400	pH	AF	5/7/2012
005	00056	Flow Rate	AF	5/7/2012
005	00095	Specific Conductance a	AF	5/7/2012
004	00400	pH	AF	6/7/2012
004	00056	Flow Rate	AF	6/7/2012
004	00095	Specific Conductance a	AF	6/7/2012
005	00400	pH	AF	6/7/2012
005	00056	Flow Rate	AF	6/7/2012
005	00095	Specific Conductance a	AF	6/7/2012
004	00400	pH	AF	7/7/2012
004	00056	Flow Rate	AF	7/7/2012
004	00095	Specific Conductance a	AF	7/7/2012
005	00400	pH	AF	7/7/2012
005	00056	Flow Rate	AF	7/7/2012
005	00095	Specific Conductance a	AF	7/7/2012
004	00400	pH	AF	7/21/2012
004	00056	Flow Rate	AF	7/21/2012
004	00095	Specific Conductance a	AF	7/21/2012
005	00400	pH	AF	7/21/2012
005	00056	Flow Rate	AF	7/21/2012
005	00095	Specific Conductance a	AF	7/21/2012
004	00400	pH	AF	8/14/2012
004	00056	Flow Rate	AF	8/14/2012
004	00095	Specific Conductance a	AF	8/14/2012
005	00400	pH	AF	8/14/2012
005	00056	Flow Rate	AF	8/14/2012
005	00095	Specific Conductance a	AF	8/14/2012
004	00400	pH	AF	9/7/2012
004	00056	Flow Rate	AF	9/7/2012
004	00095	Specific Conductance a	AF	9/7/2012
005	00400	pH	AF	9/7/2012
005	00056	Flow Rate	AF	9/7/2012
005	00095	Specific Conductance a	AF	9/7/2012
004	00530	Total Suspended Solids	AF	9/14/2012
004	00400	pH	AF	9/14/2012
004	00056	Flow Rate	AF	9/14/2012
004	00095	Specific Conductance a	AF	9/14/2012
005	00530	Total Suspended Solids	AF	9/14/2012
005	00400	pH	AF	9/14/2012
005	00056	Flow Rate	AF	9/14/2012
005	00095	Specific Conductance a	AF	9/14/2012
004	00400	pH	AF	9/21/2012
004	00056	Flow Rate	AF	9/21/2012
004	00095	Specific Conductance a	AF	9/21/2012
005	00400	pH	AF	9/21/2012
005	00056	Flow Rate	AF	9/21/2012
005	00095	Specific Conductance a	AF	9/21/2012
003	00530	Total Suspended Solids	AF	9/28/2012
003	00610	Nitrogen, Ammonia (NH3)	AF	9/28/2012

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003	00610	Nitrogen, Ammonia (NH3)	AF	9/28/2012
003	00610	Nitrogen, Ammonia (NH3)	AF	9/28/2012
003	00610	Nitrogen, Ammonia (NH3)	AF	9/28/2012
003	31616	Fecal Coliform	AF	9/28/2012
003	80082	CBOD 5 day	AF	9/28/2012
003	50060	Chlorine, Total Residual	AF	9/28/2012
003	00665	Phosphorus, Total (P)	AF	9/28/2012
003	00400	pH	AF	9/28/2012
003	00550	Oil and Grease, Total	AF	9/28/2012
003	00056	Flow Rate	AF	9/28/2012
004	00530	Total Suspended Solids	AF	9/28/2012
004	00665	Phosphorus, Total (P)	AF	9/28/2012
004	00400	pH	AF	9/28/2012
004	01118	Chromium, Total Recoverable	AF	9/28/2012
004	01119	Copper, Total Recoverable	AF	9/28/2012
004	00056	Flow Rate	AF	9/28/2012
004	00095	Specific Conductance a	AF	9/28/2012
004	01062	Molybdenum (Mo)	AF	9/28/2012
004	01102	Tin, Total (Sn)	AF	9/28/2012
004	01104	Aluminum, Total Recoverable	AF	9/28/2012
005	00530	Total Suspended Solids	AF	9/28/2012
005	00665	Phosphorus, Total (P)	AF	9/28/2012
005	00400	pH	AF	9/28/2012
005	01118	Chromium, Total Recoverable	AF	9/28/2012
005	01119	Copper, Total Recoverable	AF	9/28/2012
005	00056	Flow Rate	AF	9/28/2012
005	00095	Specific Conductance a	AF	9/28/2012
005	01062	Molybdenum (Mo)	AF	9/28/2012
005	01102	Tin, Total (Sn)	AF	9/28/2012
005	01104	Aluminum, Total Recoverable	AF	9/28/2012
004	00400	pH	AF	10/14/2012
004	00056	Flow Rate	AF	10/14/2012
004	00095	Specific Conductance a	AF	10/14/2012
005	00400	pH	AF	10/14/2012
005	00056	Flow Rate	AF	10/14/2012
005	00095	Specific Conductance a	AF	10/14/2012
004	00400	pH	AF	10/21/2012
004	00056	Flow Rate	AF	10/21/2012
004	00095	Specific Conductance a	AF	10/21/2012
005	00400	pH	AF	10/21/2012
005	00056	Flow Rate	AF	10/21/2012
005	00095	Specific Conductance a	AF	10/21/2012

As RES is aware, the reporting code violations are due to the accessibility of Outfalls 003, 004 and 005. On December 5, 2012, RES notified Ohio EPA that it had completed the dredging on its storm water ponds and perimeter ditches downstream of Outfalls 003, 004, and 005 to ensure that these outfalls remain free flowing. No additional information is needed to respond to these violations.

Reporting Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00400	pH	1/Week	1	0	09/22/2012
001	00056	Flow Rate	1/Day	1	0	09/24/2012
001	00056	Flow Rate	1/Day	1	0	09/25/2012
001	00056	Flow Rate	1/Day	1	0	09/26/2012
001	00056	Flow Rate	1/Day	1	0	09/27/2012
001	00056	Flow Rate	1/Day	1	0	09/28/2012
001	00056	Flow Rate	1/Day	1	0	09/29/2012
001	00056	Flow Rate	1/Day	1	0	09/30/2012

During the inspection, RES provided an eDMR printout for September 2012 indicating that pH was collected for the week of September 22, and that flow data was collected for September 24, 25, 26, and 27, with no flow reported on September 28, 29, and 30. Please revise and resubmit the September 2012 eDMR to remove these violations.

Compliance Schedule Violations

1. Final Effluent Limit Compliance Report (NPDES Permit Part 1C, Item A): In the March 21, 2012 RES response letter, RES stated that no additional treatment processes are required to meet final effluent limits, and references that a separate report detailing this information will be provided under separate cover. In review of Ohio EPA's 2012 files, we were unable to locate any record of a report received from RES detailing the actions to be taken to achieve compliance with final effluent limitations. As indicated in the tables above, effluent violations continue at the RES facility. According to the compliance schedule, this report was due to be submitted to Ohio EPA no later than February 1, 2010. Please provide this information as prescribed by your permit.
2. Mixing Zone Study (NPDES Permit Part 1C, Item C): In the March 21, 2012 response letter, RES provided a schedule for completing the mixing zone study. A time was tentatively scheduled but cancelled due to unfavorable lake conditions. RES indicated that the mixing zone study fieldwork commenced the week of July 30, 2012 and has been completed, and that the consultant is preparing the final report. The mixing zone study was due to be completed and a final report submitted to Ohio EPA by August 1, 2010 per your compliance schedule. Please provide Ohio EPA with this report as soon as possible.
3. Toxicity Reduction Evaluation Progress Report (NPDES Permit Part 1C, Item D3): In the March 21, 2012 RES response letter, RES stated that they expect to have a TRE report from their consultant by April 2012. In review of Ohio EPA's 2012 files, we were unable to locate any record of a TRE report received from RES. According to the compliance schedule and Section 3.0 of the October 2009 report titled *Strategy for Implementation of a Toxicity Reduction Evaluation*, this report was due to be submitted to Ohio EPA no later than August 1, 2010. In correspondence dated July 21, 2011, November 17, 2011, and March 21, 2012, RES stated that that RES has not received data or reports from EnviroScience, their consultant. Please provide this information as prescribed by your permit.

Other Violations

1. Maintenance of Treatment Facility in Good Working Order (NPDES Part III, Item 3A): From examination of the MFU building, the structure supporting tanks and process lines remains corroded to a point where Ohio EPA questions the structural integrity of the support structure. This area must be repaired and maintained to ensure that the integrity is

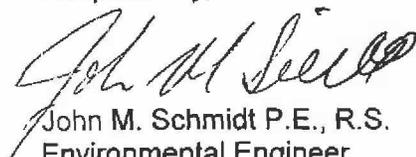
maintained. Consideration should be given to corrosion-resistant materials such as fiberglass or stainless steel. RES acknowledged that repairs are needed in their March 21, 2012 response to the January 2012 CEI and has performed some interim measures to support some piping, and provided a schedule for completing these repairs in April-May 2012. While some repairs to pipe supports had been made from the last inspection, the steel frame supports for tanks and pipes in the MFU process are still noted as severely corroded and is also corroding the cement floor around the MFU unit. RES has obtained the structural steel for necessary repairs, but has not yet implemented the repairs according to the schedule submitted in the March 21, 2012 RES response letter.

The free liquid treatment facility along LaBounty Road has been inactive for at least two months due to needed repairs to a tank support system. RES must get this system back into operation as soon as possible.

Based upon the above information, Reserve Environmental Services remains in significant noncompliance. 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. Due to the duration and nature of the violations and permit noncompliance, this office has referred RES to our central office for escalated enforcement.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

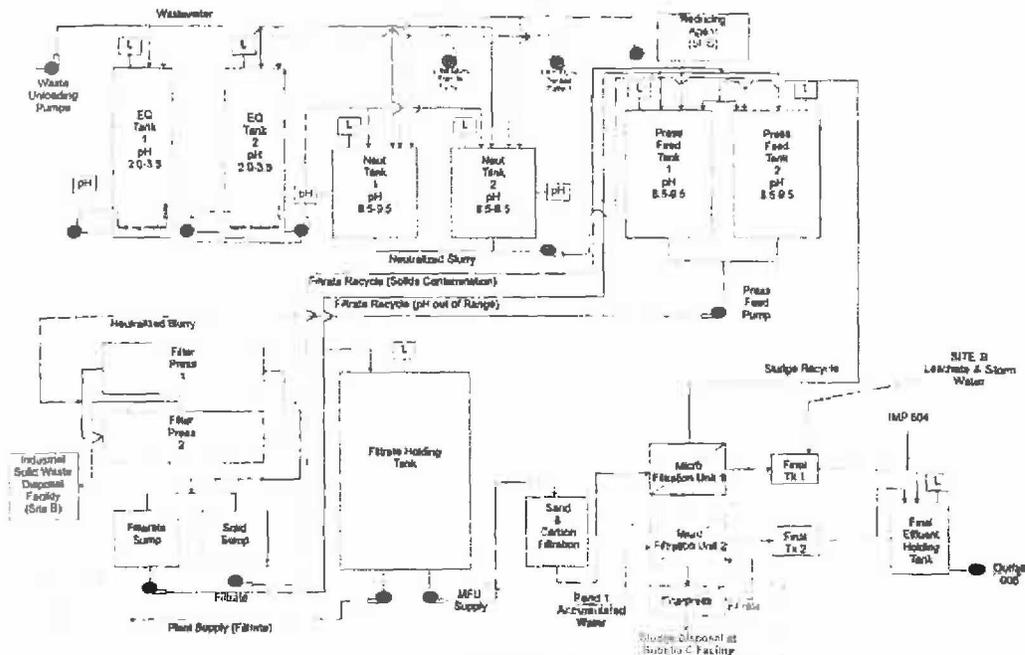

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Jonathan Moody, U.S. EPA, Region V
Mark Mann, Ohio EPA, DSW, CO

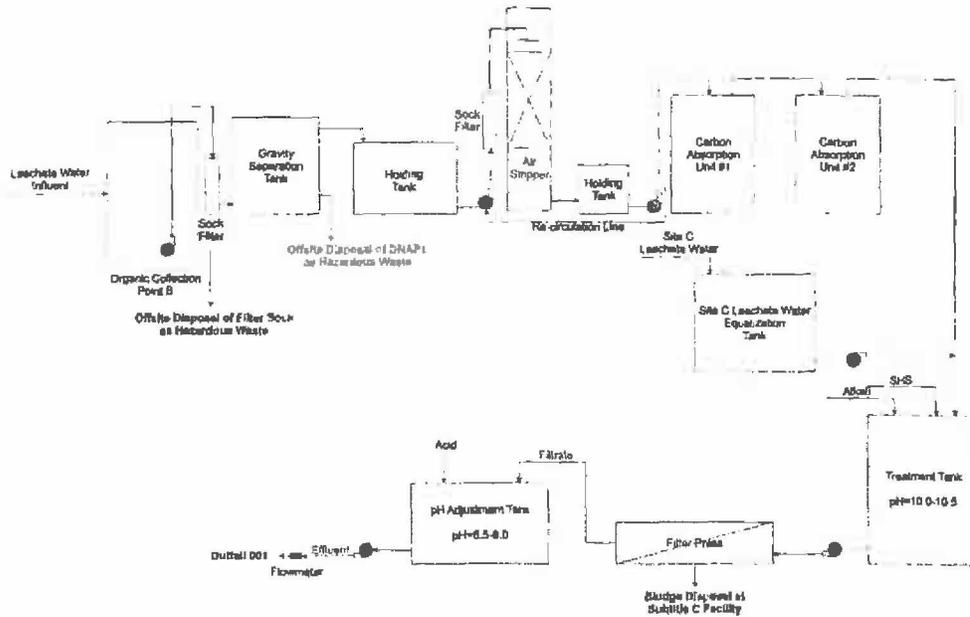
ec: Frank Zingales, Ohio EPA, DMWM-HW NEDO
John Hujar, Ohio EPA, DMWM-SW, NEDO

File: Industrial/Reserve Environmental Services/PC



RES WASTEWATER TREATMENT SYSTEM - PROCESS FLOW DIAGRAM - FIGURE 1

Prepared By: RES 11/12/12



FREE LIQUID TREATMENT FACILITY - PROCESS FLOW DIAGRAM - FIGURE 2

Prepared By: RES 11/12/12



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

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<p>1. Article Addressed to:</p> <p>Mr. Yogi Chakshi, President Reserve Environmental Services, Inc. 4633 Middle Road Ashtabula, OH 44004</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label) 7612 1010 0002 2260 0826 DSW</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

