



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

February 11, 2013

RE: STATE ROAD INDUSTRIAL DEVELOPMENT
OHIO EPA PERMIT: 3IE00012
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Ronald L. McVoy
State Road Industrial Development, LLC
600 State Road
Ashtabula, OH 44004

Dear Mr. McVoy

On February 7, 2013, a site inspection was conducted at the above referenced facility at 600 State Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody represented State Road Industrial Development, LLC (SRID) or Steron during the inspection, although I spoke with you both prior to and after 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 the renewal of said permit. The last compliance inspection was conducted on July 25, 2011.

Observations and Notations

The following observations, notations, and associated recommendations were made during the inspection:

1. State Road Industrial Development, LLC (SRID) has applied to transfer the NPDES permit from SRID to Steron, LLC. Both corporations list Mr. McVoy as President. The requested date of transfer is February 1, 2013. The request is being processed by Ohio EPA.
2. The existing extended aeration plant has been inactive since April 26, 2012, when the plant was connected to the City of Ashtabula collection system via the State Road sewer. As the City of Ashtabula and Ashtabula have yet to finalize the Joint Economic Development District (JEDD) for this area of Ashtabula Township, the connection is considered temporary.
3. Pumps and electrical gear have been removed from the plant and placed into storage. Water is maintained in the existing aeration tank to keep the tanks from floating.
4. There is no final discharge at the Diamond-Shamrock Tributary due to the tie-in to the State Road sewers.
5. Ron McVoy submits electronic discharge monitoring reports (eDMRs) through Ohio EPA's Web-based application. No flow has been reported since April 2012.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2011 through January 1, 2013 indicates noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations are noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	32.	8/1/2011
001	00530	Total Suspended Solids	30D Qty	0.0455	.12112	8/1/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	8/22/2011
001	00530	Total Suspended Solids	7D Conc	18	32.	8/22/2011
001	00530	Total Suspended Solids	7D Qty	0.0682	.12112	8/22/2011

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of the violations, along with measures taken to ensure that they are not repeated. SRID connected to the City of Ashtabula's sewers on April 26, 2012 on a temporary basis while Ashtabula County and Ashtabula City negotiate an agreement on forming a JEDD. Ohio EPA also acknowledges that Director's Final findings and Orders (DFFOs) are being finalized between Ohio EPA and SRID to resolve these and other violations. No additional information is needed at this time.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed. Frequency violations are not listed in tabular form, but include weekly observations of temperature, color severity, odor severity, and turbidity severity, as well as a quarterly analysis of pH between July 1, 2011 and October 15, 2011.

During this site visit and the July 25, 2011 visit, you provided documentation that weekly color, odor, and turbidity readings had been taken by SRID staff when the plant was operating. This information needs to be incorporated into previously submitted eDMRs. Ohio EPA's files reflect that you terminated sample collection at the wastewater plant on December 1, 2011. Ohio EPA files reflect that no eDMR reports were filed for December 2011, January 2012, or February 2012, and our discussions during the site visit indicated that no plant data was collected during this time. Ohio EPA also acknowledges that a consent agreement is being finalized between Ohio EPA and SRID to resolve these and all previous violations. However, any data that was collected on the plant, either by yourself or by your laboratory, must be submitted to Ohio EPA by amending your eDMRs. Therefore, the July 2011 through November 2011 eDMR reports must be revised to incorporate any missing data that was collected on this facility. During the visit, we discussed how to amend the previously submitted eDMRs.

Compliance Schedule Violations

SRID has not completed any of the milestones listed in its compliance schedule, including commencing construction on plant improvements, completing construction, and attaining operational limits as prescribed by the permit. None of the above milestones have been completed. Ohio EPA acknowledges that DFFOs are being finalized between Ohio EPA and SRID to resolve these and other violations. No additional information is needed to respond to these violations at this time.

Other Violations: Failure to Submit all Data Required by your Discharge Monitoring Reports -
Pursuant to Part III, Item 4 of your NPDES permit, State Road Industrial Development, LLC is required to submit the required DMR data for all parameters as prescribed by your NPDES permit. Ohio EPA is missing eDMRs for December 2011, January 2012, and February 2012, and previous eDMRs do not data gathered at the facility. As noted above, any data that was collected on the plant, either by yourself or by your laboratory, must be submitted to Ohio EPA by amending your eDMRs.

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: Michael Shapiro, Ohio EPA, DSW Legal, CO
Brittany Schuch, Ohio EPA, DSW, CO

File: Industrial/State Road Industrial Development/P/C