



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

Re: **Notice of Violation**  
Allen County  
Guardian Lima Holdings, LLC  
Ohio EPA Permit No. 2IN00238  
NPDES Permit No. OH0143367

March 11, 2013

Ms. Debra Kay Neal  
EH&S Manager  
Guardian Lima Holdings, LLC  
2485 Houx Parkway  
Lima, Ohio 45804

Dear Ms. Neal:

We are in receipt of your self-monitoring report covering the months of July through December 2012 for the referenced facility. Our review indicates a violation of the conditions of your National Pollutant Discharge Elimination System (NPDES) permit. The specific instance of non-compliance is enclosed on a separate sheet.

Please be reminded that according to your NPDES permit and as discussed previously, you will need to report the AC code for either the Total Residual Chlorine parameter or the Total Residual Oxidants parameter, depending upon whether the cooling tower additive(s) used contain chlorine or bromine. The test for both parameters is the same; you are to report the value for the test result under the appropriate parameter in your monthly discharge monitoring report and report the AC code for the other parameter.

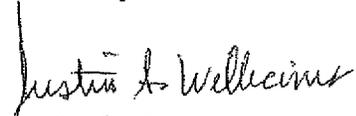
Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in your Part III-General Conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code (ORC) Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

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The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. Information about Ohio EPA's Office of Compliance Assistance & Pollution Prevention can be found on Ohio EPA's Website at <http://epa.ohio.gov/ocapp> or by calling (614) 644 – 3469.

If there are any questions, please contact me at (419) 373 – 3022.

Sincerely,



Justin A. Williams  
Environmental Specialist II  
Division of Surface Water

/jlm

Enclosure

ec: NOV Tracking

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Violation for Guardian Lima, LLC - July - December 2012

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
2IN00238*BD	December 2012	001	34044	Oxidants, Total Residu	1/Month	1	0	12/1/2012