



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

March 20, 2013

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

**NOTICE OF VIOLATION**

**CERTIFIED MAIL**

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

Dear Mr. Chokshi:

On December 13, 2012, compliance sampling was conducted at the above referenced facility at 4633 Middle Road, Ashtabula Township, Ashtabula County. Paul Anderson represented Ohio EPA during the sampling event. Ms. Lisa Specht and Mr. Bernie Roskovics represented Reserve Environmental Services, Inc. (RES) during the sampling event. The purpose of the inspection was to conduct compliance sampling and 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 this sampling.

The sampling consisted of one 24-hour composite sample was taken from the tap in the final tank at Outfall 006 and downstream of Outfall 604. A copy of a report detailing the results has been included with this letter. A review of the CSI sampling conducted by Ohio EPA showed concentrations of ammonia in the final effluent of 534 mg/l to 588 mg/l. A copy of a flow diagram provided to Ohio EPA by RES is also attached.

In looking for a source of the elevated ammonia levels shown in the attached analytical results, a list of waste streams provided to Mr. Frank Zingales of Ohio EPA's Division of Materials and Waste Management (DMWM) was provided to Ohio EPA's Division of Surface Water (DSW). From examination of this list, it appears that waste ammonium bifluoride solution is being treated by RES. This waste stream is not approved by Ohio EPA for treatment at RES.

The analytical results indicate that RES is in violation of the following of its NPDES permit:

1. Change in Influent Characteristics: Part III, Item 16 of your NPDES permit requires RES to provide advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Notification of permit changes or anticipated noncompliance does not stay any permit condition. For nonpublic industrial discharges, Item 16B states that "...for non-publicly owned treatment works, any proposed facility expansions, production increases, or process modifications, which will

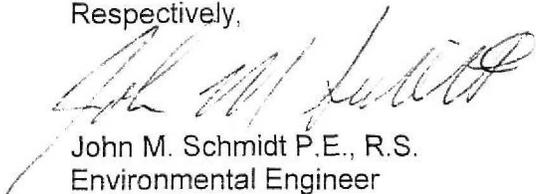
*result in new, different, or increased discharges of pollutants.” As noted above, the ammonium bifluoride solution is not approved by Ohio EPA for treatment at RES. Please provide Ohio EPA with a list of all waste streams currently treated through the treatment process that is tributary to Outfall 006, and immediately cease acceptance of any and all waste streams that you have not been authorized to accept for treatment.*

2. Effluent Limit Violations: From examination of the CSI sampling conducted by Ohio EPA, RES is exceeding its daily effluent limits for total suspended solids and nickel. In addition, many parameters exceed water quality standards. Please see the attached spreadsheet for results of this sampling.

***Based upon the above information and the findings of our previous inspections, RES remains in significant noncompliance. Please be advised that past and present issues of noncompliance continue as subjects of future enforcement actions by Ohio EPA.***

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

Respectively,



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

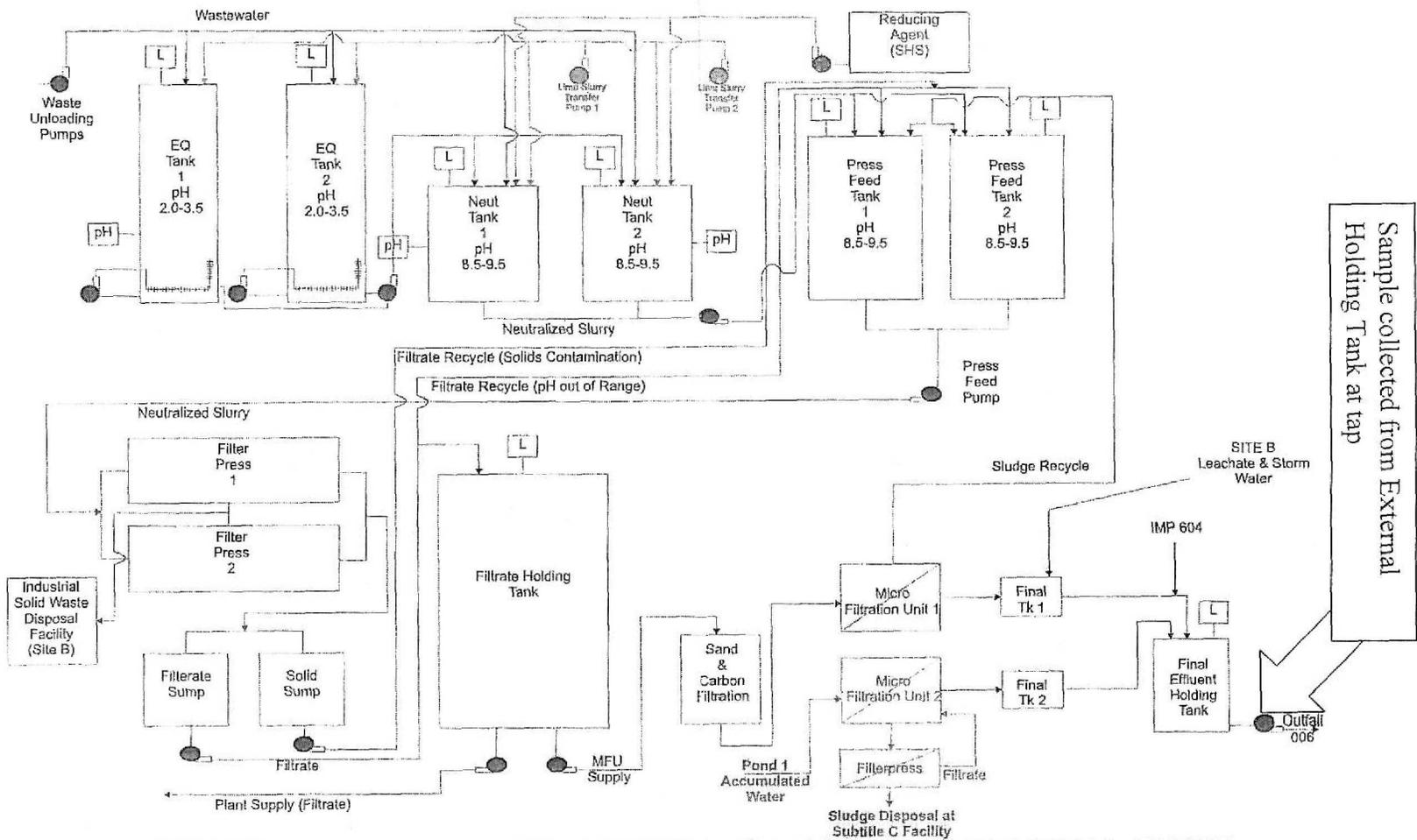
JMS/cs

Enclosures: Data Tables Ohio EPA RES CSI Sampling 12-13-2012  
RES Process Flow Diagram 11/10/2010

ec: Bill Zawiski, Ohio EPA, DSW, NEDO  
Mandy Razzano, Ohio EPA, DSW, NEDO  
Jennifer Kurko, Ohio EPA, DO, NEDO  
Dean Stoll, Ohio EPA, DSW, NEDO  
Mark Mann, Ohio EPA, DSW, CO

cc: Jonathan Moody, U.S. EPA Region V

File: Industrial/Reserve Environmental Services/PC, w/encl



**RES WASTEWATER TREATMENT SYSTEM - PROCESS FLOW DIAGRAM - FIGURE 1**

Prepared By: RES 11/10/10

Sample collected from External Holding Tank at tap

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Sent To Yogi Chokshi  
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See Reverse for Instructions

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1. Article Addressed to:

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

2. Article Number

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PS Form 3811, February 2004

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