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

May 16, 2013

RE: PORTAGE COUNTY
PALMYRA TOWNSHIP
HYDRO CONDUIT CORPORATION
NPDES PERMIT NO. OH0129178
OHIO EPA PERMIT NO. 3IN00318

David McClintock, Manager
Hydro Conduit Corporation
Rinker Materials Concrete Pipe Division
4200 Universal Drive
Diamond, OH 44412

Dear Mr. McClintock:

This letter is a follow-up to the inspection conducted by the undersigned at the above referenced facility on April 16, 2013, 2003. The facility was represented by Mr. Brent Hilliard, Production Manager. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the facility's treatment processes and equipment and effluent discharge quality at the outfall(s).

NPDES Permit Status
The NPDES permit for this facility was issued effective May 1, 209 and will expire on April 30, 2014. The NPDES permit authorizes the discharge of wastewater from the following sources:

Station 602: Treated effluent from the 2,500 gpd sewage treatment plant

Station 603: Non-contact cooling water and steam condensate

Outfall 001: Combined discharge to Kale Creek (includes flows Stations 602, 603 and storm water associated with industrial activity

Facility Description
The facility manufactures precast concrete products, e.g. conduits, etc., primarily for use in sewer and drainage systems (SIC Code 3272 - Concrete Products).

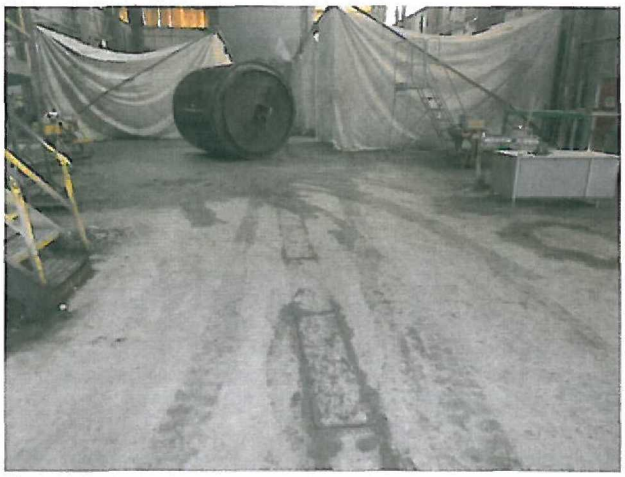
Components of the sewage treatment plant consists of a trash trap, extended aeration activated sludge treatment process, settling tank, dosing chamber, dual-unit surface sand filter, and effluent disinfection (using chlorination & de-chlorination tablets).

Inspection Findings/Compliance Status
At the time of the inspection, the following issues were identified and discussed with Mr. Hilliard:

- The sewage treatment plant appeared to be functioning properly. The effluent being discharged from the chlorine contact tank was visually clear. However, it does appear that

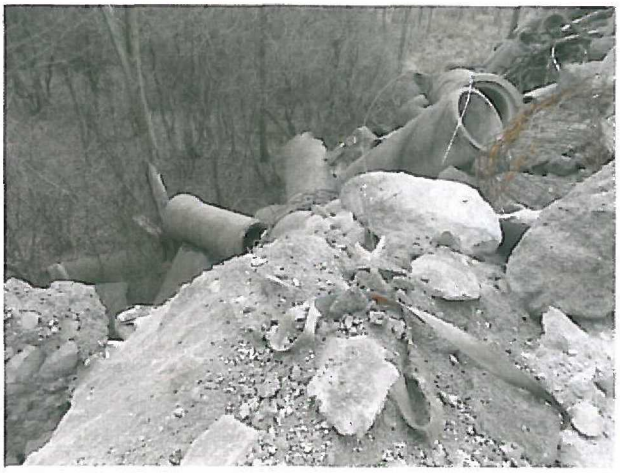
the aesthetic appearance of the plant can be improved. This would include improving surface drainage around the aeration tank to limit rainwater intrusion and painting the rusted blower covers.

- It was noted that washwater, approximately 20 – 50 gallons/day, from the facility's operations is being discharged to Outfall 001. The NPDES permit does not authorize this washwater to be discharged. Washwaters must be directed into a system designed to remove solids prior to discharge, such as sediments basins, retention basins, and other equivalent measures. Where possible, the washwater shall be recycled/reused as make-up water in the production process.




- The facility currently lacks adequate storm water control measures ahead of Outfall 001 as well as the drainage area(s) at the rear of the industrial property. Typically, a combination of preventive and treatment best management practices (BMPs) will yield the most effective stormwater management for minimizing the offsite discharge of pollutants via stormwater runoff.



- The NPDES permit requires the placement of an identification sign at any outfalls containing sanitary or industrial discharges. No such sign was evident at Outfall 001.

- In accordance with Ohio Administrative Code (OAC) 3745-7-09(A), the owner and operator of record of a sewage treatment system are required to maintain operation and maintenance records for the system. For small treatment systems, these records are generally kept in a bound logbook with consecutive page numbering. Additionally, the records shall document that weekly staffing requirements are being met.

- In accordance with Parts IV, V and VI of the NPDES permit, the permittee is required to maintain and implement a storm water pollution prevention plan (SWP3). However, there was no documentation on site to demonstrate that that facility had an updated SWPPP. Additionally, it does not appear that any comprehensive site compliance evaluations had been performed since 2009. This constitutes as a significant violation of the NPDES permit and must be immediately addressed.

- In accordance with Part III of the NPDES permit, analytical test procedures shall conform to regulation 40 CFR 136, "Test Procedures for the Analysis of Pollutants". The review noted that the following improper equipment or procedures were being employed:

    - pH meters must be equipped with a temperature compensation adjustment and accurate to 0.1 pH unit with a range of 0 -14 pH. The Extech Model pH 50 being utilized does **not** meet these requirements. Additionally, no calibration standards, e.g. pH 7 and 10, were being utilized.

    - Water temperature measurements must be made with a thermometer designed for partial or total immersion. The use of a non-contact infrared (IR) thermometer, i.e. Fluke IR, does meet the requirement of the NPDES permit.

    - In addition to pH and temperature, measurements for dissolved oxygen (DO) and chlorine residual must be performed immediately upon sample collection, i.e. onsite. Hence, the samples cannot be transported to an off-site laboratory.

Discharge Monitoring Reports (DMR)

A review of the facility's monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period, May 2009 – March 2013, was reviewed for compliance with the final effluent limitations and monitoring requirements of the NPDES permit. A summary of the specific violations are cited in Attachments A and B.

In addition to the above, the following indicates that the following reporting violations:

- DMRs were not received by Ohio EPA for January 2012 and March 2013.

- Flow rate data for Station 602 and Outfall 001 are inconsistent with the information obtained during the inspection. In the case of Station 602, it would appear that the "elapsed-time meter" data have not been properly converted to flow rate (i.e. pump rating **X** the pump run time). By way of example, a 60 gpm pump running for a total period of 2 minutes (0.03 hr)

per day equates to a flowrate of 120 gallons/day. **Once the actual flowrates have been confirmed, all DMRs for this period must be revised and resubmitted as expeditiously as practicable.**

- As noted above, the reported temperature readings at Station 602 and Station 603 are incorrect.

- With respect to Outfall 001, the substitution code "**AL- No discharge**" cannot be used when there is contributing flow at either Station 602 or 603. Please revise and resubmit the following DMRs as appropriate:

Station	Date	A Code
001	2/1/2010	AL
001	9/1/2010	AL
001	1/1/2011	AL
001	4/1/2011	AL
001	7/1/2011	AL
001	9/1/2011	AL
001	10/1/2011	AL
001	12/1/2011	AL
001	4/1/2012	AL
001	5/1/2012	AL
001	7/1/2012	AL
001	9/1/2012	AL
001	10/1/2012	AL
001	1/1/2013	AL

Please be advised that any violations referenced herein are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to $10,000 per day of violation. Within 10 days of the date of this letter, please provide this office with written notification as to the actions taken or proposed to correct the violations and/or deficiencies cited above. Your response must include dates for completion of the actions. Additionally, a copy of the updated and certified SWPPP shall be submitted to this office within 30 days of receipt of this letter.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,

Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

Attachment A: Rinker Materials Numeric Effluent Violations (5/2009 – 3/2013)						
Reporting Period	**Station**	**Parameter**	**Limit Type**	**Limit**	**Reported Value**	**Violation Date**
June 2009	602	Total Suspended Solids	30D Conc	12	23.5	6/1/2009
June 2009	602	Fecal Coliform	30D Conc	1000	3000.	6/1/2009
June 2009	602	Total Suspended Solids	1D Conc	18	23.5	6/30/2009
June 2009	602	Dissolved Oxygen	1D Conc	6.0	5.03	6/30/2009
November 2009	001	Total Suspended Solids	30D Conc	30	298.	11/1/2009
November 2009	001	Total Suspended Solids	1D Conc	45	298.	11/30/2009
March 2010	602	Total Suspended Solids	30D Conc	12	23.	3/1/2010
March 2010	602	Total Suspended Solids	1D Conc	18	23.	3/31/2010
June 2010	602	Total Suspended Solids	30D Conc	12	25.	6/1/2010
June 2010	602	Fecal Coliform	30D Conc	1000	2000.	6/1/2010
June 2010	602	Total Suspended Solids	1D Conc	18	25.	6/29/2010
August 2010	602	Fecal Coliform	30D Conc	1000	23000.	8/1/2010
October 2010	001	Total Suspended Solids	30D Conc	30	353.	10/1/2010
October 2010	001	Total Suspended Solids	1D Conc	45	353.	10/29/2010
October 2010	001	pH	1D Conc	6.5	6.09	10/29/2010
November 2010	001	Total Suspended Solids	30D Conc	30	32.5	11/1/2010
December 2010	602	Total Suspended Solids	30D Conc	12	15.5	12/1/2010
February 2011	001	Total Suspended Solids	30D Conc	30	204.	2/1/2011
February 2011	001	Total Suspended Solids	1D Conc	45	204.	2/28/2011
March 2011	602	Total Suspended Solids	30D Conc	12	30.5	3/1/2011
March 2011	602	Nitrogen, Ammonia (NH3	30D Conc	2.0	7.64	3/1/2011
March 2011	602	Total Suspended Solids	1D Conc	18	30.5	3/31/2011
March 2011	602	Nitrogen, Ammonia (NH3	1D Conc	3.0	7.64	3/31/2011
August 2011	602	Fecal Coliform	30D Conc	1000	3200.	8/1/2011
February 2012	001	Total Suspended Solids	30D Conc	30	1569.	2/1/2012
February 2012	001	Total Suspended Solids	1D Conc	45	1569.	2/16/2012
February 2012	001	Oil and Grease, Total	1D Conc	10	16.7	2/16/2012
March 2012	602	Total Suspended Solids	30D Conc	12	19.	3/1/2012
March 2012	602	Total Suspended Solids	1D Conc	18	19.	3/27/2012
June 2012	602	Total Suspended Solids	30D Conc	12	16.5	6/1/2012
August 2012	602	Fecal Coliform	30D Conc	1000	6400.	8/1/2012
August 2012	602	Fecal Coliform	7D Conc	2000	6400.	8/22/2012

Attachment B: M Rinker Materials Monitoring/Reporting Violations (5/2009 – 3/2013)						
Reporting Period	**Statio n**	**Parameter**	**Sample Frequency**	**Expected**	**Reported**	**Violation Date**
August 2009	602	Total Suspended Solids	1/Quarter	1	0	8/1/2009
August 2009	602	Nitrogen, Ammonia (NH3	1/Quarter	1	0	8/1/2009
August 2009	602	Fecal Coliform	1/Quarter	1	0	8/1/2009
August 2009	602	CBOD 5 day	1/Quarter	1	0	8/1/2009
August 2009	602	Chlorine, Total Residu	1/Quarter	1	0	8/1/2009
August 2009	602	pH	1/Quarter	1	0	8/1/2009
August 2009	602	Dissolved Oxygen	1/Quarter	1	0	8/1/2009

Attachment B: M Rinker Materials Monitoring/Reporting Violations (5/2009 – 3/2013)						
Reporting Period	**Station**	**Parameter**	**Sample Frequency**	**Expected**	**Reported**	**Violation Date**
December 2010	602	Water Temperature	1/Week	1	0	12/22/2010
December 2010	602	Color, Severity	1/Week	1	0	12/22/2010
December 2010	602	Odor, Severity	1/Week	1	0	12/22/2010
December 2010	602	Turbidity, Severity	1/Week	1	0	12/22/2010
December 2010	602	Flow Rate	1/Week	1	0	12/22/2010