



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

May 22, 2013

RE: NPDES PERMIT 3IE00050
CP CHEMICALS GROUP, LP
LAKE COUNTY
INDUSTRIAL

Ms. Lindsey Krauth
Director of Human Resources/
Health & Safety Coordinator/
Purchasing Manager
CP Chemical Group, LP
28960 Lakeland Boulevard
Wickliffe, OH 44092

Dear Ms. Krauth:

On May 21, 2013, this writer conducted a compliance evaluation inspection of the process water treatment system serving the CP Chemicals Group facility. The purpose of the inspection was to evaluate the operation and maintenance condition of the process water treatment system, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit. You and Mr. Jason Huntington, Maintenance Manager, accompanied this writer during the inspection.

The CP Chemicals Group is a producer of nickel sulfate solutions and crystal; nickel carbonate and hydroxide; cobalt sulfate solutions and crystal; and cobalt carbonate. The raw materials used consist of reclaimed cobalt and nickel feedstocks/byproducts from other companies as well as virgin cobalt and nickel metal sources. There are 49 employees at the Wickliffe facility. The facility has two shifts and operates 24 hours a day, 7 days per week.

Sanitary wastewater, process water and storm water discharges are generated at this facility. Sanitary wastewater is treated at the Euclid Wastewater Treatment Plant. Process water and storm water are discharged directly to waters-of-the-state via storm sewers. One process water outfall and four storm water outfalls are permitted through the existing NPDES permit. Outfall 001 is the process effluent that is discharged via Outfall 004, the eastern most storm sewer on Lakeland Boulevard. Storm water associated with industrial activity is discharged through all of the permitted storm water outfalls. All of the outfalls are located on the northern section of the property, tie into the city's storm sewers on Lakeland Boulevard, and discharge to Lake Erie.

Process water treatment consists of metal precipitation using caustic, filtration using plate filter presses and pH neutralization using sulfuric acid prior to flowing to a 90,000 gallon collection tank and discharging to Outfall 001. Effluent laboratory analyses are performed onsite. At the time of inspection the process water outfall 001 and the storm water outfalls 003, 004, 005 and 006 were discharging. The discharges were clear with no observed visual impacts.

During the inspection, you stated that the Storm Water Pollution Prevention Plan is updated yearly. An updated copy of the plan was provided; however, you were unable to locate the signed and certified copy of the plan. This is a violation of the NPDES permit. In accordance with Parts IV and VI of NPDES permit, a current signed and certified plan must be retained onsite and made available upon request by Ohio EPA. Please provide verification that the Storm Water Pollution Prevention Plan has been signed and certified.

Also, this writer understands that CP Chemicals is investigating the possibility of connecting the process water discharge to the City of Euclid sanitary sewer collection system. If the process water connection to the public sanitary sewer comes to fruition, please notify this office in writing.

A review of the Discharge Monitoring Reports from October 2011 through April 2013 revealed the following permit limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01067	Nickel, Total (Ni)	30D Conc	360	370.5	10/1/2011
001	61941	pH, Maximum	1D Conc	9.0	9.2	10/2/2011
001	61941	pH, Maximum	1D Conc	9.0	9.1	10/3/2011
001	61941	pH, Maximum	1D Conc	9.0	9.1	10/4/2011
001	61941	pH, Maximum	1D Conc	9.0	9.1	10/5/2011
001	01067	Nickel, Total (Ni)	30D Conc	360	549.75	1/1/2012
001	01067	Nickel, Total (Ni)	30D Conc	360	620.5	2/1/2012
001	01067	Nickel, Total (Ni)	1D Conc	1040	1725.	2/11/2012
001	61941	pH, Maximum	1D Conc	9.0	11.9	9/6/2012
001	61941	pH, Maximum	1D Conc	9.0	10.9	10/19/2012

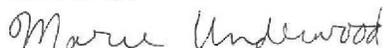
A review of the Discharge Monitoring Report (DMRs) shows that when various pollutant parameter concentrations are below the method detection limit of the pollutant, the AA data substitution code is reported on the DMRs, as required. However, the method detection limit used for the test is occasionally reported in the comment section of the DMR as zero. Method detection limits are typically some number greater than zero. The specific procedures for determining method detection limits are found in Appendix B of Chapter 40, Part 136 of the Code of Federal Regulations.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code, Chapter 6111.

This office has reviewed the reports addressing the reasons for the above effluent violations and the corrective action taken. No additional information is requested at this time.

Should you have questions regarding this letter, please contact the undersigned at (330)963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/cs