



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

May 24, 2013

RE: PREMIX INC. ASHTABULA PLANT
OHIO EPA PERMIT 3IQ00031
KINGSVILLE VILLAGE, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Walter P. McSherry, Jr., Environmental Manager
Premix, Inc.
P.O. Box 281
North Kingsville, Ohio 44068-0281

Dear Mr. McSherry:

On May 23, 2013, a site inspection was conducted at the above referenced facility at 3365 East Center Street (U.S. Route 20 at Harmon Road), Village of North Kingsville, Ashtabula County. The inspection was conducted by John Schmidt of this office. Roger Osburn represented Lewis Wastewater Services, your operator. Following the inspection I met with Mr. Walt McSherry and Christina Lianopoulos of Premix and examined plant records. 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. The last compliance inspection was conducted on June 4, 2012.

No industrial process wastewater is discharged to the wastewater treatment systems other than industrial storm water and non-contact cooling water. Wastewater treatment at Premix Inc. is accomplished by two different processes (see attached figure):

Industrial Wastewater Treatment and Storm Water Treatment (Oil/Water Separator)

Under drains from Manufacturing Areas A, B, and C, representing the eastern half of the manufacturing area, flow to an oil/water separator prior to discharge to a storm water retention pond. Storm water from paved areas of the facility also flows to the storm water pond. Following settling in the retention pond, water flows to a wastewater lagoon. The lagoon discharges to the east side ditch along Harmon Road to an unnamed tributary to Lake Erie. The tributary is located along Harmon Road northwest of the plant.

Plant Sanitary Wastewater Treatment

The plant receives plant sanitary wastes. The system consists of a trash trap, equalization tank; extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publicly owned treatment works (POTW). The outfall from the wastewater treatment plant (WWTP) is outfall 601. Flows from the sanitary WWTP (Outfall 601), the noncontact cooling water (Outfall 602), and storm water from various sources are combined. The combined plant effluent discharges to a wastewater lagoon and is sampled as Outfall 001, and discharged to the ditch along Harmon Road for ultimate discharge to an unnamed tributary to Lake Erie northwest of the plant. No backup power is provided to the facility, and the facility is provided with alarms.

Noncontact Cooling Water:

Noncontact cooling water and roof drains D and E is discharged to the retention pond as Outfall 602 where it combines with Outfall 601 (Sanitary WWTP outfall) and the oil/water separator discharge. The combined plant effluent discharges to a wastewater lagoon and is sampled as Outfall 001, and discharged to the ditch along Harmon Road for ultimate discharge to an unnamed tributary to Lake Erie northwest of the plant.

Observations

The following observations were made during the inspection:

1. There have been no changes in industrial processes since the last inspection. A process flow diagram is attached.
2. The design flow of the extended aeration plant is 26,000 gallons per day, although the plant is not receiving anywhere near that flow. The plant is currently receiving between 100 gpd and 5,000 gpd. The plant operates on a timer for three hours in the morning and three hours in the afternoon when the plant receives flow.
3. The plant is operated by Roger Osburn of Lewis Wastewater Services who also operates a variety of other facilities in Ashtabula County as a contract operator.
4. Log books and the operation, contract, NPDES permit, and maintenance manual are maintained at the site and were available for inspection. The log books were found compliant with Ohio Administrative Code (OAC) 3745-7-09.
5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash was containerized for disposal at a solid waste landfill.
6. The pumps for the influent pump station were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The content of the aeration tank had a chocolate brown color and good mixing. Sludge returns were also a chocolate brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
8. The surface of the clarifier was clear. The return sludge lines and skimmer were found in proper operation. Effluent channels and weirs were reasonably clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were not as clean as noted in previous inspections. Sludge was removed from the main part of the beds and piled along the perimeter. Mr. Osburn indicated he inadvertently left a backwash line open and this disturbed the clarifier, sending solids to the sand beds. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
11. Sludge was removed from the facility April 26, 2013

12. The composite sampler was found in operating condition. A manual thermometer in a jar of water should be maintained in the sampler refrigerator compartment as a verification of proper temperature.
13. The UV disinfection system was inspected and found in operating condition.
14. The final effluent from the sanitary plant was clear as observed in a manhole between the plant and the final outfall. The final discharge at the pond could not be observed as it was partially submerged by the pond/tributary.
15. Samples are collected by Microbac. Microbac performs on-site analysis of pH and DO, while Lewis Wastewater Services and Premix staff perform observations of flow, color, odor, and turbidity. Microbac Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Mr. McSherry submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
16. The oil/water separator (OWS) for the industrial storm water was cleaned on April 26, 2013. The OWS is not cleaned twice yearly. Chemetron hauls for Premix. The holding pond was cleaned on April 24, 2012. The pond was observed as nearly empty.
17. No flow from the blow down and storm water discharge was observed during the inspection (Outfall 602).
18. The lagoon water level was observed as several feet below the level of the final discharge (Outfall 001). No discharge was observed from the final lagoon, with rainwater flowing from the ditch into the Final Outfall 001.
19. The storm water pollution prevention plan (SWPPP) was updated on November 5, 2010, and verified as needing no additional changes as of December 14, 2012. The annual site certification inspection was completed on December 14, 2012. Employee training is conducted throughout the year, with the latest training conducted in July 2012. During the discussion, we discussed that some of Mr. McSherry's duties will be transitioning to Ms. Lianopoulos. The SWPPP will need to be revised to reflect these changes.
20. No evidence of discharges was noted from the roll-off box storage area.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2012 through April 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00300	Dissolved Oxygen	1D Conc	6.0	5.2	8/31/2012
601	00300	Dissolved Oxygen	1D Conc	6.0	2.4	9/7/2012
601	00400	pH	1D Conc	6.5	6.41	10/5/2012
601	00400	pH	1D Conc	6.5	6.17	10/12/2012
601	00400	pH	1D Conc	6.5	6.	10/19/2012

601	00400	pH	1D Conc	6.5	6.1	10/26/2012
601	00400	pH	1D Conc	6.5	6.2	11/9/2012
601	00400	pH	1D Conc	6.5	6.3	11/21/2012
601	00400	pH	1D Conc	6.5	6.3	11/30/2012
601	00400	pH	1D Conc	6.5	6.4	12/7/2012

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. Ohio EPA received notification of the August 2012 and September 2012 violations on September 11, 2012 and September 20, 2012, respectively. Ohio EPA received notification of the October 2012 violations on October 18, 2012, October 23, 2012, November 3, 2012, and November 13, 2012. Ohio EPA received notification of the November 2012 violations on December 3, 2012 and December 11, 2012. Ohio EPA received notification of the December 2012 violation on January 8, 2013. The frequency of pH violations placed Premix in **significant noncompliance** with the terms and conditions of the NPDES permit for the fourth quarter of 2012. During the inspection, Mr. McSherry indicated that employees were reminded that only sanitary waste is permitted to be discharged to the wastewater treatment plant. It appears that the pH issues have been resolved. Please note that if violations continue, a schedule for plant improvements will be required.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

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: Dustin Lewis, Lewis Wastewater Management
Roger Osburn

File/Industrial/Premix/pc

