



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

May 31, 2013

RE: CLEAN HARBORS PPM, LLC ASHTABULA
OHIO EPA PERMIT 3II00202*AD
ASHTABULA CITY, ASHTABULA COUNTY
SITE RECONNAISSANCE VISIT

Mr. James C. Childress, VP
Environmental Compliance
Clean Harbors PPM, LLC
2815 Old Greenbriar Pike
Greenbriar, TN 37073

Mr. Shantanu Pahi
Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg, OH 44087

Dear Mr. Childress and Mr. Pahi:

On May 16, 2013, a site inspection was conducted at the above referenced facility at 1302 West 38th Street, Ashtabula City, Ashtabula County. The inspection was conducted by John Schmidt of this office. Michael Mearini, Superintendent from the Ashtabula City WWTP, and James Timonere, City Manager, also accompanied Ohio EPA on the inspection. Mr. Todd Drenski represented Clean Harbors PPM, LLC (Clean Harbors) during the inspection. The purpose of the inspection was to evaluate the progress of the facility upgrades and 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 January 30, 2013.

Storm Water Management

Storm water management includes water from building footer drains and runoff from paved areas of the facility formerly used to store transformers. Waste is collected in a series of yard drains and sumps and is collected at the catch basin adjacent to the east driveway apron which is then pumped to a portable frac tank (Tank 1), relocated inside the building. When the tank nears capacity, the treatment system includes pumping the water through a series of 25, 5, and 1 micron filters, then to another frac tank (Tank 2). Wastewater is stored in two frac tanks (Tanks 3 and 4) relocated inside the building until tested. If testing is acceptable, it is discharged to a yard drain located on the west side of the building. The yard drain flows into the storm water system located along West 38th Street, which discharges to Strong Brook. In the event that water does not meet the testing requirements, Tank 3 has the ability to discharge back into the storm water collection system at the rear on the building for complete treatment again. The headworks sump contains an additional sump that cycles wastewater away from the sump to the southeastern corner of the site.

Plant Sanitary Waste Water Treatment:

Plant sanitary wastes are conveyed to the Ashtabula City sanitary wastewater plant located northeast of the Clean Harbors facility for treatment and are not a part of this NPDES permit.

Observations and Notations

The following observations and notations were made during the inspection:

1. Clean Harbors only accepts PCB materials from the storm water collection system and does not accept PCB materials from any off-site sources. The facility ceased acceptance of off-site materials for PCB removal in August 2009. Drums labeled PCBs containing spent filters, tank cleanouts, and production tools were noted inside the building.
2. The system was not operating at the time of the inspection.
3. The berms discussed with Ohio EPA at the northeast corner of the facility have not been installed.
4. No materials appeared to be located outside the facility, with all frac tanks now located inside the building. No transformers or other electrical equipment appear to be present at the site.
5. The design flow of the PCB treatment wastewater treatment plant is 63,000 gpd.
6. No discharge was noted in the manhole due to lack of the system operating. The discharge is into a blue-green PVC pipe within the manhole, which flows north to West 38th Street.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period January 1, 2013 through May 1, 2013 indicates that there are no effluent, reporting, or compliance violations. However, it should be noted that the current permit expires on December 31, 2013, and that pursuant to Part III of your permit, a renewal application must be received by Ohio EPA no later than 180 days prior to the expiration of your current permit. Therefore, a renewal application must be received no later than July 1, 2013.

Noted Violations and Recommendations

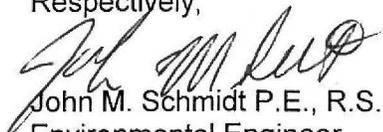
1. **Unauthorized Discharges:** Unauthorized discharges were observed on January 17, 2013 and January 30, 2013. Pursuant to Part III, Item 12 of your permit, Clean Harbors notified Ohio EPA of the discharges. Ashtabula City has been monitoring the storm sewer system downstream of the clean Harbors facility and noted intermittent levels of PCBs in sediments recovered from catch basins downstream of the West 38th Street facility. At a minimum, the facility must be inspected during all precipitation events and personnel present during any events, such as thawing, that have the potential to provide significant water accumulation at the sump. Clean Harbors must provide a noncompliance notification for all future events where there has been a release of untreated or partially treated storm water to Ashtabula's storm sewer system.
2. **Duty to Mitigate:** Part III, Item 14 of your permit requires you to take all reasonable steps to minimize or prevent any discharge in violation of your permit. On the January 30, 2013 inspection, the system was overflowing, yet the treatment system was not connected and operating. The system must be substantially upgraded to ensure that untreated wastewaters do not leave the site. As a part of the January 30, 2013 noncompliance notification, Clean Harbors acknowledged that a new design for the treatment system is currently being developed that will incorporate additional safety measures and include additional pumping capacity. In addition, Clean Harbors has submitted a soil sampling plan to U.S. EPA under the TSCA program to identify levels of PCBs remaining at the site. Ohio EPA requires the following:

- Following the January 30, 2013 inspection, Ohio EPA requested a schedule for a permit-to-install (PTI) application that will address these issues. To-date no PTI application has been received. **Please provide Ohio EPA a schedule of when to expect this PTI application.** This will be a condition of your modified NPDES permit.
- The system must be designed to ensure that there is no release from a 25-year, 24-hour storm event. Ohio EPA notes that there is no berm installed around the influent sump to prevent a release from a 25-year, 24-hour storm event. Clean Harbors also discussed relocating the influent pump station to the southwest portion of the property, which has not occurred yet. **Please provide to Ohio EPA a schedule of when these system improvements will be completed.**
- Following the January 30, 2013 inspection, Ohio EPA requested that a schematic of the system be readily available to onsite personnel and all pipe sources in all catch basins, sumps, and manholes known. A schematic was not available during the inspection. **Please provide a revised schematic to Ohio EPA and have one available at the site.**
- As noted in the January 30, 2013 inspection, Ohio EPA advised Clean Harbors that if Clean Harbors resumes the acceptance of materials for any onsite treatment, Ohio EPA may require a more robust storm water treatment system. This will be a condition of your modified NPDES permit.
- The influent sump must contain a minimum of two pumps capable of pumping wastewater to the frac tanks or a spare pump maintained at the site and readily available for installation in the event that the primary pump becomes inoperable. Currently, the second pump in the influent sump only recirculates wastewater back into the surface collection system. **Please provide a spare pump onsite or retrofit the sump so that two pumps are available to pump to the treatment system.**

Please inform this office, in writing, within 30 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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: Michael Mearini, City of Ashtabula WPCF

File/Industrial/Clean Harbors, PPM LLC /PC