

September 9, 2013

Don Hock
Superior Fibers, Inc.
499 North Broad Street
Bremen, OH 43107

**Re: Notice of Violation
Superior Fibers, Inc., Fairfield County
Reconnaissance Inspection
Indirect Discharge Permit 4DP00011*CP
Industrial Storm Water Permit 4GR00655*DG
NDPES Permit 4IN00053*GD**

Dear Mr. Hock:

Thank you for taking time to meet with me on Wednesday, September 4, 2013. The purpose of the site visit was to evaluate your compliance with Ohio EPA indirect discharge permit conditions and pretreatment requirements as well as your industrial storm water permit. During the site visit I discussed the operation of the pretreatment system and the need to decommission the plant and collection system once your facility is closed. You stated that it is expected that your facility will close by the end of October 2013. Please consider this a formal notice of violation of your industrial storm water permit. The following items were identified during reconnaissance inspection.

Indirect Discharge Permit

1. The entire facility and the pretreatment system will be demolished once the facility is closed. I stressed the need that you contact the Village of Bremen regarding the treating of the wastewater from your facility, especially if the wastewater strength or volume changes significantly.
2. The pretreatment system, including the collection system, should be pumped to remove all the pollutants prior to demolition. You will

need to work with the Village of Bremen to insure that the sanitary sewer connections all permanently plugged. Since part of the collection system that discharges to your pretreatment system also collects storm water, it is important that the collection system also be demolished after your facility closes.

3. Your pretreatment system had two oil and grease violations during the inspection period. The inspection period was from April 1, 2012 to August 1, 2013. One oil and grease violation of 271mg/l was noted on 2/27/13 and another on 6/26/13 of 255 mg/l was noted. Your oil and grease limit is 100 mg/l. The two violations did not cause the Village of Bremen's wastewater treatment plant to violate their discharge permit.
4. The Village of Bremen's wastewater treatment plant only had one violation during the inspection period. The violation occurred on 7/8/13 due to exceeding its e-coli violation.

Industrial Storm Water Permit

1. There was waste oil from a spill stored in the uncovered loading dock area. Please see pictures. The waste oil should be cleaned from the loading dock area and properly disposed of at an approved treatment facility. This oil should not be discharged to your pretreatment system. Please submit a copy of the hauling invoice to this office.
2. There were totes and drums of waste oil not stored in contained areas. Please store totes and drums of waste fluids in contained areas and under roof. The totes and drums should have lids.
3. It appeared that some of the drums were being stored over the collection system grating and discharging to the pretreatment system. The fluids should not be directed to the pretreatment system, but hauled off-site and treated by an approved facility. Please provide hauling invoices to this office.

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4. Old batteries and oily parts were stored outside. Old batteries and oily parts should be stored under roof in a contained area.
5. Your waste containers should be covered unless it is used to store only cardboard or wooden pallets. Also, there needs to be better housekeeping around your waste containers.
6. Superior Fibers shall submit notice of termination (NOT) applications to the Ohio EPA once the facility closes and demolition is complete. NOTs are needed for the indirect discharge permit, Industrial storm water permit and the NPDES permit.

If you need additional information or assistance, please feel free to contact me by e-mail at greg.sanders@epa.state.oh.us or phone at (614) 728-3851.

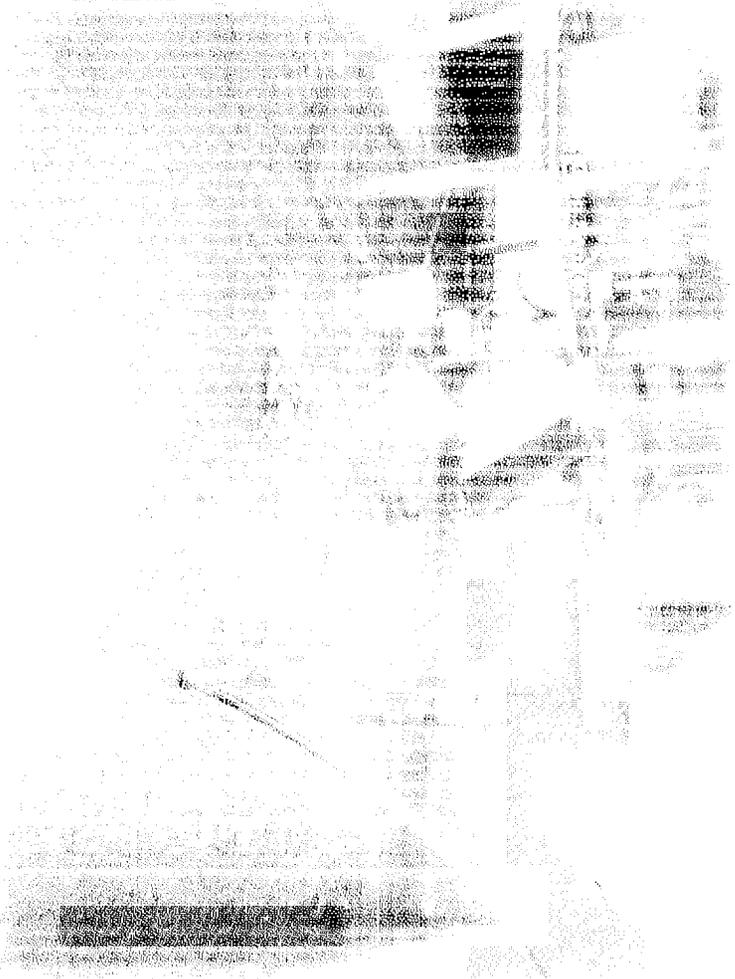
Sincerely,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: David Hohman, M&WM, CDO Ohio EPA
Doug Hockman, Village Administrator, Bremen
Byron Bowersox, Bremen WWTP



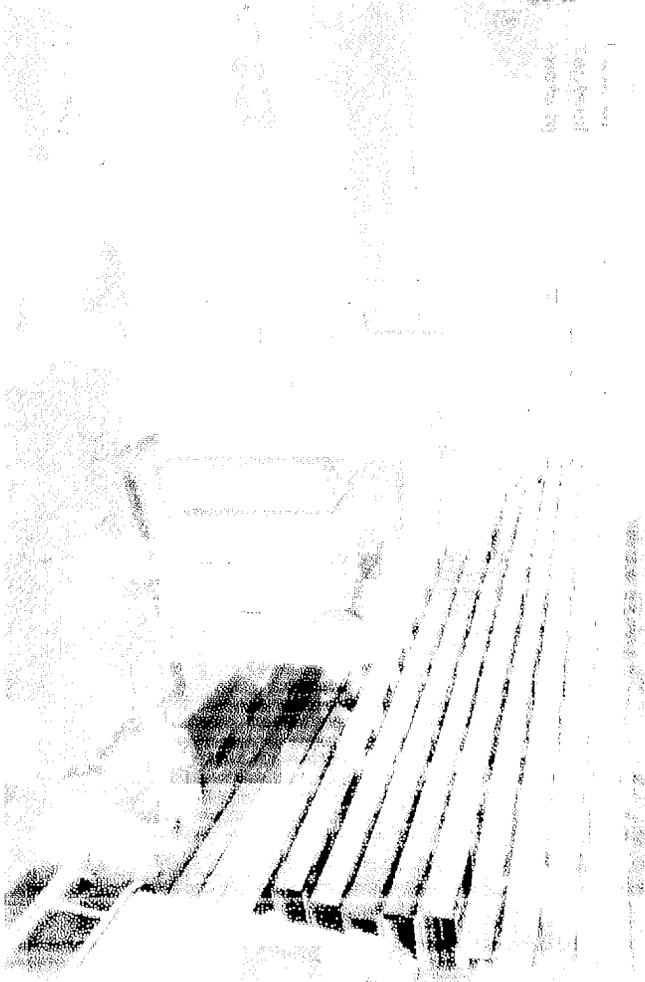


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