



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

September 25, 2013

**Re:** Tuscarawas County  
Boltaron Performance Products, LLC  
Compliance Evaluation Inspection  
0IQ00019, OH0004430

Dr. Dean Li, President  
Boltaron Performance Products, LLC  
One General Street  
Newcomerstown, Ohio 43832

Dear Dr. Li:

On September 4, 2013, I conducted a Compliance Evaluation Inspection (CEI) of the Boltaron Performance Products, LLC facility. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number 0IQ00019\*ED. Tim Ohler was present during the inspection.

As a result of the inspection, I have the following comments:

1. A review of the facility's discharge monitoring reports (DMRs) from January 2012 through July 2013 showed no violations of permit limits.
2. The facility's Storm Water Pollution Prevention Plan (SWPPP) has not been updated in over ten years. **This is a violation of Part IV, Item C of the permit which requires the SWPPP to be kept current.** Please update the SWPPP so that it reflects the current design, construction, operation and maintenance of the facility.
3. During the inspection, I observed a small amount of plastic resin pellets (approximately 5lbs) that had been spilled on the ground in the railcar unloading area. The spilled pellets should be cleaned up immediately and anytime these pellets are spilled during unloading of the railcar they should be cleaned up immediately.
4. Mr. Ohler has been maintaining records of the analytical results from Coshocton Environmental however these records did not include the chains of custody (COC). Please request the COCs from Coshocton Environmental for all sampling events and keep them on file.

**Item 2 constitutes violations of your permit.** Please address and provide a response to this item within thirty (30) days upon receipt of this letter.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Attached is a copy of the inspection report. If you have any questions about my inspection, please feel free to contact me at (740) 380-5418 or [tim.fulks@epa.ohio.gov](mailto:tim.fulks@epa.ohio.gov).

Sincerely,



Timothy A. Fulks  
District Representative  
Division of Surface Water

TF/dh

Enclosure

c: Tim Ohler, Quality Manager, Boltaron Performance Products, LLC



State of Ohio Environmental Protection Agency  
Southeast District Office

Industrial NPDES Compliance Inspection Report

**Section A: National Data System Coding**

Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0IQ00019*ED	OH0004430	September 4, 2013	C	S	2

**Section B: Facility Data**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Boltaron Performance Products, LLC One General Street Newcomerstown, Ohio 43832	9:45 a.m.	June 1, 2010
	Exit Time	Permit Expiration Date
	11:15 a.m.	May 31, 2015
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Tim Ohler, Quality Manager	(740) 498-5900, Ext. 245	
Name, Address, and Title of Responsible Official	Phone Number	
Dr. Dean Li, President One General Street Newcomerstown, Ohio 43832	(740) 498-5900	

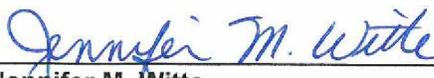
**Section C: Areas Evaluated During Inspection**

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

S	Permit	S	Flow Measurement	N	Pretreatment
M	Records/Reports	S	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
M	Facility Site Review	N/A	Sludge Storage/Disposal	N/A	Other
N/A	Collection System				

**Section D: Summary of Findings** (attach additional sheets if necessary)

See attached letter.

Inspector	Reviewer
	
9/25/13 Date	9/25/13 Date
Timothy A. Fulks Division of Surface Water Southeast District Office	Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office

Sections E through K: Complete on all inspections as appropriate  
Y = Yes; N = No; N/A = Not Applicable; N/E = Not Evaluated

### Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Do Categorical Standards apply? If yes, list applicable standards..... N
- (d) Product(s) and production rates conform with permit application (Industries) ..... N/A
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application ..... Y
- (g) All discharges are permitted ..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted ..... Y

Comments/Status:

### Section F: Compliance

- (a) Any significant violations since the last inspection ..... N
- (b) Appropriate Non-compliance notification of violations..... N/A
- (c) Permittee is taking actions to resolve violations ..... N/A
- (d) Permittee has a compliance schedule ..... N
- (e) Compliance schedule contained in ..... N/A
- (f) Permittee is in compliance with schedule ..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection ..... N/A

Comments/Status:

### Section G: Operation and Maintenance

#### Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available generator  or dual feed  ..... N
  - i. What does the back-up power source operate
  - ii. How often is the generator tested under load
- (b) Which components have an alarm system available for power or equipment failures
- (c) All treatment units in service other than backup units ..... Y
- (d) What method is used for scheduling routine and preventative maintenance (calendar, software, etc.)
- (e) Any major equipment breakdown since last inspection ..... N
- (f) Operation and maintenance manual provided and maintained ..... Y
- (g) Any plant bypasses since last inspection ..... N
- (h) Any plant upsets since last inspection ..... N

#### Comments/Status:

### Section H: Sludge Management

- (a) Method of Sludge Disposal.....
  - Land Application
  - Haul to Another NPDES Permittee
  - Haul to a Mixed Solid Waste Landfill

\*if one of the selected methods is land application, complete applicable charts.

**Class A – Exception Quality Sewage Sludge (monitoring station 584)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 – 38% Volatile Solids Reduction	Option 2 – Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 - >75% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 – Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Gamma Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Class B – Sewage Sludge (monitoring station 581)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 – 38% Volatile Solids Reduction	Option 2 – Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 - >75% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 – Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has amount of sludge generated changed significantly since the last inspection ..... N/A
- (c) How much sludge storage is provided at the plant
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06) ..... N/A
- (e) Any complaints received in last year regarding sludge ..... N/A
- (f) 5/8" screen at headworks for facilities that land apply sludge ..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit ..... N/A
- (h) Is a contractor used for sludge disposal ..... N/A  
If so, what is the name of the contractor

Comments/Status:

### Section I: Self-Monitoring Program

#### Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained ..... Y  
Type of device (e.g., weir with ultrasonic level sensor):
- (b) Calibration frequency adequate ..... N/A  
Date of last calibration:
- (c) 24-hour recording instruments operated and maintained ..... Y
- (d) Flow measurement equipment adequate to handle full range of flows ..... Y
- (e) Actual flow discharged is measured ..... Y
- (f) Flow measuring equipment inspection frequency  
Daily:  Weekly:  Monthly:  Other:

Comments/Status:

**Sampling:**

- (a) Sampling location(s) are as specified by permit ..... Y
- (b) Parameters and sampling frequency agree with permit ..... Y
- (c) Permittee uses required sampling method (see GLC page) ..... Y
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e., continuous monitoring instrumentation, calibration and maintenance records) ..... Y

**Comments/Status:**

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite ..... N/A
- (b) Do SOP's include the following if applicable ..... N/A

- Title
- Scope and Application
- Summary
- Sample Handling & Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control
- Maintenance
- Corrective Action
- Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3) ..... Y
- (d) If alternate analytical procedures are used, proper approval has been obtained ..... N/A
- (e) Analyses being performed more frequently than required by permit ..... Y
- (f) If (e) is yes, are results in permittee's self-monitoring report ..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment (see score from GLC page) ..... N/E
- (h) Commercial laboratory used ..... Y

Parameters analyzed by commercial lab: **All parameters**

Lab name: **Coshocton Environmental**

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling ..... N/A  
Date:
- (b) Were any parameters "Unsatisfactory" ..... N/A
- (c) Reasons for "Unsatisfactory" parameters

Comments/Status:

**Section J: Effluent/Receiving Water Observations**

Outfall #: **001 & 002**

Outfall Description: **Final Outfall**

Receiving Stream: **Unnamed Tributary to Tuscarawas River**

Receiving Stream Description: **No observable adverse impact to receiving stream**

Comments/Status:

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work & storage areas or laboratories ..... Y
- (b) Do you notice staining or discoloration of soils, pavement or floors..... N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

During the inspection, a small amount (approximately 5 lbs) of plastic resin pellets were observed on the ground in the railcar unloading area.