



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

Re: **Notice of Violation**
Hardin County
Durez Corporation
NPDES Permit

October 2, 2013

Mr. William H. Bazell
Manufacturing Manager
Durez Corporation – Kenton Plant
13717 U S Route 68 South
Kenton, Ohio 43326

Dear Mr. Bazell:

On September 26, 2013, Mr. Thomas Poffenbarger and I conducted a National Pollutant Discharge Elimination System (NPDES) permit Compliance Inspection at the Durez Corporation – Kenton Plant. Mr. Brad Scarberry and Mr. Chris Coak of Durez Corporation, and Ms. Ann Scott of Industrial Fluid Management were present and provided information on operation and maintenance of the wastewater treatment system. The inspection included an interview, a tour of the production process and wastewater treatment plant (WWTP), observation of the final effluent outfall at Taylor Creek and a brief review of the Stormwater Pollution Prevention Plan (SWPPP). The final effluent to Taylor Creek was clear, colorless and had no noticeable odor.

SWPPP

The SWPPP needs to include:

1. The following certification statement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." 40 CFR 122.22

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2. The names and training records of the Pollution Prevention Team.
3. Any sampling records of the storm water discharged.
4. Inspection records of the comprehensive site evaluation.

Compliance

A review of the discharge monitoring reports (DMRs) from September 2012 to September 2013 shows that there have been several effluent limit violations. The specific instances of noncompliance are enclosed on a separate sheet.

Our completed inspection report is enclosed for your records. If you have any comments or questions, please contact me at 419-373-3006.

Sincerely,



Peggy B. Christie
Division of Surface Water

/jlm

Enclosures

ec: Inspection Tracking



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2IF00002	OH0006769	9/26/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Durez Corporation – Kenton Plant 13717 U S Route 68 South Kenton, Ohio 43326	10:00 AM	February 1, 2012
	Exit Time	Permit Expiration Date
	12:00 PM	January 31, 2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Brad Scarberry, Engineering Maintenance Utilities Mgr Mr. Chris Coak, WWTP Operator Ms. Ann Scott, IFM, Operator of Record	567-295-6404 (Dale Miller) 419-675-5300	
Name, Address and Title of Responsible Official	Phone Number	
Mr. William H. Bazell, Manufacturing Manager Durez Corporation – Kenton Plant 13717 U S Route 68 South Kenton, Ohio 43326	419-675-5303	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Clarifier Effluent was clear. There was a buildup of solids in the outer ring.</p> <p>Discharge to Taylor Creek was clear, colorless and had no apparent odor.</p> <p>Contents of the 6401 tank had a reddish tint; 6402 appeared black; 6403 slightly green.</p> <p>AF codes reported for April 11 and 12, and July 9, 2013. Chris explained that when Taylor Creek floods, river water is in the outfall 001 sump and would not be representative of the effluent.</p> <p>TSS violations in November 2012 and April 2013.</p>	
Inspector	Reviewer
 Peggy B. Christie Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water
Date 10/1/13	Date 10/1/13

Sections E thru 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) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... N
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

TSS violations in November 2012 and April 2013. AF codes used for April 11 and 12, 2013 and July 9, 2013.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: IFM is the Operator of Record holding Class II and III
- (f) Copy of certificate of Operator of Record displayed on-site..... N
Copies of the certificates were sent to NWDO 1/28/13
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Computer IFM keeps a written log book on site.

- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

If power goes out facility will not receive flow into the treatment system.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
 Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... Y
 (Method: Landfilled)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
 (Name: Rumpke to landfill)
- (f) Has amount of sludge generated changed significantly since
 last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/A
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

Sludge is aerobically digested then sent through a plate/frame press with a polymer being added. The sludge is contained in a 30 yard container that is hauled offsite when full.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
 Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
 Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
 (Date of last calibration: September 2012)
- (c) Secondary 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:

Flow meter is calibrated by maintenance.

Section I: Self-Monitoring Program (con't)

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..... Y
 (see GLC page 5 and 8)
- (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

Laboratory:

General

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite N/A
- (b) Do SOP's include the following if applicable:
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: SOP's are required per Standard Methods 1020A and states "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."

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). 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

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. Y
 (see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
 Date:
- (j) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: All parameters required by the permit.
 Lab name: Alloway

Comments/Status:

Only process control sampling is performed on site.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes							

Comments/Status:

Discharge clear with no noticeable odor.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. Y
- (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:

Noticed sludge in the secondary containment area around the wastewater treatment plant.

Limit Violations for Durez Corporation

from 9/1/2012 through 9/1/2013

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2012	001	00530	Total Suspended Solids	1D Conc	45	72.	11/28/2012
November 2012	001	00530	Total Suspended Solids	30D Conc	30	32.25	11/1/2012
April 2013	001	00530	Total Suspended Solids	1D Conc	45	52.	4/26/2013
April 2013	001	00530	Total Suspended Solids	30D Conc	30	34.3333	4/1/2013