Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 27, 2011

RE: GABRIEL PERFORMANCE PRODUCTS
ASHTABULA STATE ROAD FACILITY
NPDES PERMIT NO. 3IF00002*JD
ASHTABULA TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Tyce Workman, Environmental Manager
Gabriel Performance Products, LLC
725 State Road
Ashtabula, Ohio 44004

Dear Mr. Workman:

On December 20, 2011, a site inspection was conducted at the above referenced facility at 725 State Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of Ohio EPA's Division of Surface Water (DSW). You, Andy Balazs, Dennis Woodard, and Adam Sikora represented Gabriel Performance Products, LLC (Gabriel). 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 November 16, 2010.

The plant primarily produces specialty chemicals for the pharmaceutical petroleum, aerospace and other industries on a small batch-basis through a combination of blending, reacting, heating, distilling, drying, filtering, and packaging. Photographs were not permitted within the facility, so photographic documentation is limited to outside the facility perimeter fence. The waste water system consists of the following industrial processes and discharges (see attached figure):

Industrial Waste Water Treatment

Process waste water is generated from Gabriel's plant sanitary waste package plant, boiler blow down and gas scrubbers, floor drains in process areas, cooling towers, salt scrubbers, and general plant housekeeping. Waste streams from the cooling towers, salt scrubber, and general plant housekeeping receive pH adjustment in the west pit by the addition of HCl and caustic prior to discharge to the north rain sump. All remaining plant waste except collected storm water and ground water are also collected by the North rain sump and are discharged into the North and South ponds for flow equalization and settling. Waste from the flow equalization ponds receive pH adjustment through HCl and caustic addition as necessary, multi-media sand filtration, air stripping and carbon treatment. Flows are metered prior to discharge as Outfall 001. Solids are separated in the multi-media filtration system. Outfall 001 is located at the outfall of the carbon treatment system before the waste water is conveyed through a pipe to manhole located along the fence at the southeastern corner of the plant just north of an adjacent railroad. Final discharge is to the Diamond Shamrock tributary west of the State Road culvert. Total flow varies, but is about 30 million gallons per year. Sludge dewatering is accomplished through a filter press, with sludge disposed of at a commercial solid waste landfill.

Sanitary Waste Water Treatment Plant

There is one sanitary waste water treatment plant (WWTP) that serves domestic sewage production from the facility. Wastewater from sanitary sources is treated through an equalization tank, trash

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trap, extended aeration facility, surface sand filtration, and tablet dechlorination prior to discharge as to a manhole as Outfall 601. The package plant discharges to the North-South equalization and settling ponds is further treated with remaining plant waste as described under industrial waste water treatment.

Curtain Drain (Ground Water Treatment) Waste Water Treatment
Volatile organic compound (VOC) laden ground water is intercepted along the entire perimeter of the facility via a slurry wall and curtain drain and is collected in the T501 sump. The collected wastewater undergoes air stripping, multimedia filtration, provisions for additional air stripping, and carbon treatment. The discharge joins remaining plant wastewater discharges as Outfall 001.

Storm Water Treatment
All storm water within the facility is collected via a series of yard drains and drainage channels and conveyed to a 30,000 gallon retention tank prior to discharge to the North-South settling ponds and is further treated as described under industrial waste water treatment.

**Observations and Notations**
Following are observations and Notations made during the inspection.

Sanitary WWTP

1. The sanitary package plant is rated at 2,000 gpd. Dennis Woodard is the operator of record. The plant was operating and discharging at the time of the inspection. The facility is fitted with alarms.

2. Verify a log book is available for the sanitary WWTP.

3. The extended aeration system had acceptable color and no odor. The blowers were running at the time of the inspection. The air did not appear to be evenly distributed across the tank, and may be an indication of a plugged or broken air line. The source should be investigated and corrected as soon as possible.

4. The clarifier was found in acceptable condition. Return sludge lines were operable.

5. The surface sand filter dosing pumps could not be cycled during the inspection, even though the float was manually raised. There was evidence that the pumps had recently cycled. Gabriel must have the ability to manually check pumps to assure that they operate properly. The alarm could also not be tested.

6. Examination of the floats for the sand filter dosing pumps may be old mercury float switches, and could be a source of elevated mercury levels in Outfall 601. If the switches are found to contain mercury they should be replaced with non-mercury floats.

7. The media in the surface sand filters were replaced in September 2011. There was some scouring noted in the sand bed at the edge of the concrete pads. Sand must be spread so that sand flows evenly over the entire surface of the sand bed. Consideration should be given to providing some stone rip-rap on the pads to keep the sand from scouring and causing the sand beds to short circuit.

8. The chlorine contact tank contained chlorine tablets, but is not required outside of the disinfection season of May through October.

9. The discharge at Outfall 601 appeared to be of a satisfactory visual quality.

Industrial WWTP

10. Gabriel obtained approvals on August 12, 2011 and June 8, 2011 for changes to water conditioning chemicals used in boiler operations. No other changes in processes were noted since the November 2010 inspection.

11. The general operation and maintenance of the air stripping, multi-media filtration, and carbon treatment systems appeared to be satisfactory.

12. The general operation of process wastewater sumps, equalization ponds, and chemical neutralization systems appeared satisfactory. The equalization ponds are lined with high density polyethylene (HDPE) and appeared in good condition. Sludge removal was discussed, and occurs annually to every other year.

13. Final outfall composite sampler was collecting composite samples, however you could not verify if the composite samples are collected on a time-proportional or flow-proportional basis. Composite samples must be collected on a flow proportional basis as specified in your NPDES permit Part II-K. Samples are maintained at the proper temperature.

14. Water temperature, color, odor, turbidity, and pH are collected by Gabriel staff. Remaining samples are collected by Gabriel staff and are analyzed by EA Group. Analytical results are reported into the electronic discharge monitoring report (eDMR) system by Mr. Workman.

15. A log book of repairs and observations of the industrial WWTP is maintained at the facility. Gabriel personnel perform routine observations, monitor the facility, and perform the sampling. Tyce Workman or Andy Balazs, under supervision of Tyce Workman, prepares the eDMR and Mr. Workman submits the eDMR through Ohio EPA's Web-based application. In the future Mr. Balazs may submit the eDMR, which will require Mr. Balazs to obtain a separate eDMR account to submit this information.

16. The storm water pollution prevention plan (SWPPP) was updated on December 7, 2011. The annual site certification was completed on December 7, 2011, and the inspection completed on October 14, 2011. Employee training on the plan occurred between March 18, 2011 and June 19, 2011. The certification statement was unsigned, and noted that an employee who has left the company is listed as the authorized signatory. Mr. Workman is now the authorized signatory. The certification statement in the SWPPP must be revised and a signed statement must be provided.

**NPDES Permit Compliance Review**

A review of the eDMRs received by Ohio EPA for the period November 1, 2010 through November 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations
The following limit violations were noted for the period reviewed:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---|---|---|---|---|---|---|
| 601 | 80082 | CBOD 5 day | 30D Conc | 25 | 30. | 11/1/2010 |
| 601 | 00530 | Total Suspended Solids | 30D Conc | 30 | 1000. | 12/1/2010 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 3.3 | 12/1/2010 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | . | 12/1/2010 |
| 601 | 00530 | Total Suspended Solids | 1D Conc | 45 | 1000. | 12/28/2010 |
| 001 | 00400 | pH | 1D Conc | 6.5 | 5. | 2/28/2011 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 5.6 | 3/1/2011 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | . | 3/1/2011 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 2.64 | 6/1/2011 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | . | 6/1/2011 |

Ohio EPA understands that Gabriel was issued a modification of its NPDES permit to reflect revised low level mercury levels on August 1, 2011. As noted above, Gabriel should investigate and eliminate mercury floats in the sanitary WWTP. As it appears that sanitary sewers may be coming to State Road, Gabriel needs to investigate and eliminate the source of mercury or Ashtabula City may subject Gabriel to pretreatment requirements prior to accepting Gabriel's sanitary flows. No response was received to explain non-mercury exceedances. Please provide a written explanation as to why the WWTP was unable to achieve these limits.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter 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

File: Industrial/Gabriel Performance Products/PC