



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 23, 2011

RE: GEAUGA COUNTY
CHANNEL PRODUCTS
NPDES #3IN00123

Mr. Jeffrey Adams
Channel Products, Inc.
7100 Wilson Mills Road
Chesterland, Ohio 44026

Dear Mr. Adams:

On November 8, 2011, I met with you to evaluate the facility with regard to the renewal National Pollutant Discharge Elimination System (NPDES) permit. The existing NPDES permit expired on June 30, 2011. Channel Products submitted the completed renewal permit application in July 2011. Until the renewal permit is issued, the company is covered under the limitations, and monitoring requirements of the expired permit.

Channel Products is a light manufacturer which includes assembling and placing components on circuit boards. The facility employs 80 people. Wastewater generated by the facility is sanitary. The wash water from the circuit board smoldering is recirculated into a deionizing filter system. The facility reuses the wash water and changes out the filters. The softener from the water treatment system is no longer in use and therefore not discharging to the wastewater treatment system. There is no wastewater produced from the closed loop cooling water system. It is understood the sanitary wastewater generated by the group home on the southern portion of the property is no longer treated at the wastewater treatment plant as that facility installed a septic system last year.

The wastewater treatment system consists of a trash trap, aeration treatment plant with clarifier, dosing chamber, surface sand filters, chlorine disinfection, dechlorination, sludge holding tank and sludge drying beds. Our records indicate the wastewater treatment plant was designed to treat 10,000 gpd.

NPDES PERMIT COMPLIANCE

At the time of the inspection, the treatment plant was in good condition at the time of the inspection. There are two blowers provided for the treatment plant. There are two blowers at the treatment plant. One blower is in service and the second is a backup blower. At the time of the inspection, one blower was in operation and the second blower was taken out of service for repairs. The backup blower was estimated to be repaired within the upcoming week. The clarifier portion of the plant contained some solids on the surface of the tank, the skimmer was not visible and the effluent weir contained solids. It is understood solids are removed from the treatment plant every 5–6 weeks. The sludge holding tank was about half full and is not aerated. The sludge drying beds are not in use. The dosing chamber was in good condition and the sand filters were in good condition. It is understood the flow is estimated and the flow monitoring is done using water use records.

The discharge monitoring reports indicate the average flow from the system over the past two years was 13,665 gpd. This flow is in excess of the wastewater treatment plant design flow of 10,000 gpd. Upon further review, it appears the flows reported for March and April 2010 are much higher than average for the wastewater treatment plant. The average flow reported between March and April 2010 was 18,555 gpd with a highest daily flow reported at 39,000 gpd on April 26, 2010. Please review the March 2010 and April 2010 flow records to ensure they were reported accurately. The flow records are attached to the letter for reference.

A summary of the wastewater treatment plant monitoring violations for the period of January 1, 2009 through November 1, 2011 is shown below. The violation summary shows violations for chlorine residual in June and September 2011. Please ensure the tablet dechlorination unit is supplied with the tablets from May through October.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	6/22/2011
September 2010	001	Chlorine, Total Residu	1D Conc	0.019	.1	9/22/2010
September 2011	001	Chlorine, Total Residu	1D Conc	0.019	.2	9/7/2011
September 2011	001	Chlorine, Total Residu	1D Conc	0.019	.2	9/20/2011
June 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	6/8/2011

Please contact this office if any errors are noted in the attached violation summary. In addition, you may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss eDMR submission and any reporting errors

The discharge monitoring revealed high reported values for Copper. These results were shown to you during the inspection and it was suspected an error occurred when the data was loaded into the eDMR. You reviewed your copper monitoring records and revealed that the eDMR data was most likely the result of a data entry error. To correct the data error, the copper monitoring data should be re-entered into the eDMR for each month of incorrect data. The elevated copper data is summarized below:

Date	Copper Monitoring (ug/l)
12/5/06	18.4
2/6/07	57.5
7/3/07	17
8/7/07	21.4
9/4/07	15
10/2/07	21.1
1/3/08	19.6
2/6/08	25.1
3/4/08	17.1
12/8/08	192
6/2/09	245

It is understood the facility no longer utilizes the softener and therefore the softener backwash water is no longer discharged to the wastewater treatment system. The NPDES permit for the facility includes a second outfall designated for the softener backwash discharge. This outfall is referred to as "outfall 002" in the NPDES permit. During the inspection, it was mentioned the

facility currently offers bottled water to employees and is planning to switch to a hauled water system. Because the facility no longer utilizes the water treatment system, outfall 002 will be removed from the draft NPDES permit. If you would like to maintain outfall 002 in the NPDES permit, please notify this office.

The NPDES permit will classify the wastewater treatment plant as a Class A treatment plant. New operator and plant certification rules have gone into effect and are found in OAC 3745-7-04. The new regulations provide the plant classification rankings and operator staffing requirements. The minimum staffing requirements for a Class A facility is 2 days per week for a minimum of 1 hour per week.

The facility is required to obtain the services of, at minimum, a Class A state certified operator. It is understood the facility currently has met this requirement and Jeffrey Gifford is the certified operator for the facility. The enclosed ORC Form must be completed and submitted to the Ohio EPA by Mr. Gifford and the facility to meet the ORC requirement for this facility.

Your NPDES renewal permit will be drafted in the near future and public noticed. Once the permit is public noticed, you will have 30 days to make any comments. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

cc: Dave Sage, Geauga County Health Department, Att:

File: Industrial/Channel Products

Enclosures: Flow Monitoring Summary

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Flow Records for Channel Products

Flow Rate	MGD	3/1/2010	0.011
Flow Rate	MGD	3/2/2010	0.01
Flow Rate	MGD	3/3/2010	0.03
Flow Rate	MGD	3/4/2010	0.04
Flow Rate	MGD	3/5/2010	0.029
Flow Rate	MGD	3/6/2010	
Flow Rate	MGD	3/7/2010	
Flow Rate	MGD	3/8/2010	0.04
Flow Rate	MGD	3/9/2010	0.04
Flow Rate	MGD	3/10/2010	0.019
Flow Rate	MGD	3/11/2010	0.039
Flow Rate	MGD	3/12/2010	0.01
Flow Rate	MGD	3/13/2010	
Flow Rate	MGD	3/14/2010	
Flow Rate	MGD	3/15/2010	0.015
Flow Rate	MGD	3/16/2010	0.02
Flow Rate	MGD	3/17/2010	0.01
Flow Rate	MGD	3/18/2010	0.014
Flow Rate	MGD	3/19/2010	0.03
Flow Rate	MGD	3/20/2010	
Flow Rate	MGD	3/21/2010	
Flow Rate	MGD	3/22/2010	0.01
Flow Rate	MGD	3/23/2010	0.011
Flow Rate	MGD	3/24/2010	0.01
Flow Rate	MGD	3/25/2010	0.015
Flow Rate	MGD	3/26/2010	0.01
Flow Rate	MGD	3/27/2010	
Flow Rate	MGD	3/28/2010	
Flow Rate	MGD	3/29/2010	0.021
Flow Rate	MGD	3/30/2010	0.021
Flow Rate	MGD	3/31/2010	0.022
Flow Rate	MGD	4/1/2010	0.015
Flow Rate	MGD	4/2/2010	0.015
Flow Rate	MGD	4/3/2010	
Flow Rate	MGD	4/4/2010	
Flow Rate	MGD	4/5/2010	0.013
Flow Rate	MGD	4/6/2010	0.013
Flow Rate	MGD	4/7/2010	0.014
Flow Rate	MGD	4/8/2010	0.012
Flow Rate	MGD	4/9/2010	0.016
Flow Rate	MGD	4/10/2010	
Flow Rate	MGD	4/11/2010	
Flow Rate	MGD	4/12/2010	0.013
Flow Rate	MGD	4/13/2010	0.013
Flow Rate	MGD	4/14/2010	0.013
Flow Rate	MGD	4/15/2010	0.013
Flow Rate	MGD	4/16/2010	0.014
Flow Rate	MGD	4/17/2010	
Flow Rate	MGD	4/18/2010	
Flow Rate	MGD	4/19/2010	0.015
Flow Rate	MGD	4/20/2010	0.023
Flow Rate	MGD	4/21/2010	0.014
Flow Rate	MGD	4/22/2010	0.016
Flow Rate	MGD	4/23/2010	0.016
Flow Rate	MGD	4/24/2010	
Flow Rate	MGD	4/25/2010	
Flow Rate	MGD	4/26/2010	0.039
Flow Rate	MGD	4/27/2010	0.031
Flow Rate	MGD	4/28/2010	0.014
Flow Rate	MGD	4/29/2010	0.011
Flow Rate	MGD	4/30/2010	0.015