

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.

NOV - 9 2005

ENTERED DIRECTOR'S JOURNAL

In the Matter of:

Durez Corporation
13717 State Route 68 South
Kenton, Ohio 43326

Director's Final Findings
and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Durez Corporation ("Respondent"), pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or the site (as hereinafter defined) shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC § 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates a phenolic resin and molding compound manufacturing facility, as classified under the Standard Industrial Classification Code 2821, and its associated wastewater treatment works ("WWTP"), located at 13717 State Route 68 South, Kenton, Ohio in Hardin County ("the facility").
2. Respondent holds an active National Pollutant Discharge Elimination System (NPDES) permit, No. 2IF00002*JD (effective July 1, 2002 and expires October 31,

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

[Signature] Date 11-9-05

2006), for the discharge from its 0.32 million gallon per day WWTP into Taylor Creek via the WWTP's outfall (Station No. 2IF00002001).

3. The WWTP discharges "sewage", "industrial waste", and/or "other wastes", as those terms are defined in ORC § 6111.01 to Taylor Creek, a tributary of the Scioto River. Taylor Creek constitutes "waters of the state" as defined by ORC § 6111.01.
4. Respondent's WWTP consists of a trickling filter that initially treats sanitary wastewater prior to combining it with process wastewater in a storage basin. The combined wastewater then flows to a mixing tank, an aeration tank, and to a clarifier for treatment. The combined wastewater is then discharged from the clarifier through a sand filter where flow from a stormwater pond is added. This combined wastewater flow is then treated by carbon adsorption filters and is discharged through internal outfall Station No. 2IF00002601. Non-contact cooling water is combined with the wastewater discharge from internal outfall Station No. 2IF00002601 and is discharged through outfall Station No. 2IF00002001.
5. On April 28, 2004, Respondent's aeration unit experienced a mechanical failure and caused an operational upset of the WWTP. Respondent placed alternative equipment into service at the WWTP on May 1, 2004 until replacement equipment was installed on May 4, 2004.
6. Respondent violated the final effluent limits of its current NPDES permit No. 2IF00002*JD on numerous occasions as cited in Attachment 1. Each violation cited in Attachment 1 constitutes a separate violation of ORC §§ 6111.04 and 6111.07. Attachment 1 is hereby incorporated into these Orders.
7. Respondent has reported all violations to Ohio EPA's Spill hotline and submitted a written five day follow-up report outlining what remedial actions were performed to prevent future violations, as cited in Attachment 2. Attachment 2 is hereby incorporated into these Orders.
8. Respondent was notified of the NPDES permit violations via Ohio EPA Notices of Violation dated December 19, 2000; May 10, 2001; November 7, 2001; October 1, 2002, December 2, 2003, July 16, 2004, September 29, 2004, and December 23, 2004.
9. On August 2-3, 2004, Ohio EPA conducted a compliance sampling event to determine the extent of toxicity present in Respondent's final effluent. Results of the August 2-3, 2004 compliance sampling event indicated that Respondent's WWTP final effluent at outfall No. 2IF00002001 was acutely toxic to *Ceriodaphnia dubia* and *Pimephales promelas* as one hundred percent (100%) mortality was observed for both species of test organisms.
10. In early September 2004, Ohio EPA received a telephone complaint from a resident living on State Route 67 near Kenton, Ohio. The complainant indicated a concern that there were few organisms alive within Taylor Creek.

11. On September 13-14, 2004, Ohio EPA staff investigated the telephone complaint at Taylor Creek and conducted a compliance sampling event to determine the extent of toxicity present in Respondent's effluent.
12. Respondent was notified via letter dated October 1, 2004 that the results of the complaint investigation indicated that the discharge from the WWTP was having an impact on Taylor Creek. Many aquatic organisms were found at a point of 50 feet upstream of outfall No. 2IF00002001. However, no live organisms were observed in Taylor Creek downstream of the outfall No. 2IF00002001 for 1.5 miles. Many shells of dead mussels were observed near State Route 67.
13. Results of the September 13-14, 2004 compliance sampling event indicated that Respondent's WWTP effluent at outfall No. 2IF00002001 were acutely toxic to *Ceriodaphnia dubia* and *Pimephales promelas* as one hundred percent (100%) mortality was observed for both species of test organisms. Respondent was notified of the preliminary and final compliance sampling results via letters dated October 1, 2004 and November 4, 2004, respectively.
14. By letter dated October 11, 2004, Respondent informed Ohio EPA of the actions taken to address the acute toxicity issues at the WWTP. Respondent contacted a biochemist to evaluate the WWTP, contracted with a consulting company to conduct a pilot study on the WWTP, stopped the addition of polymer to the clarifier, and advised the manufacturers of the polymer to evaluate their product's toxicity and recommend maximum dosages within the WWTP.
15. By letter dated November 15, 2004, Respondent informed Ohio EPA of the actions taken to address the noncompliance issues at the WWTP. Respondent's consulting company recommended a trial of an engulfed air floatation unit (EAF) to remove solids from the clarifier. The trial of the EAF commenced on November 9, 2004 and lasted until November 11, 2004. The EAF's effectiveness in the trial is currently being analyzed and final results are not yet available, however Respondent stated that the "qualitative results were promising." Respondent also ceased the polymer addition to the clarifier on November 11, 2004, reseeded the WWTP with activated sludge from the City of Kenton's WWTP on November 15, 2004, and began renting a portable EAF for temporary usage at the facility on November 19, 2004.
16. ORC § 6111.04(C) provides that no person to whom a permit has been issued shall place or discharge, or cause to be placed, or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit without first receiving a permit from the Director to do so.
17. Pursuant to ORC § 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC §§ 6111.01 to 6111.08 or violate any order, rule, or term or condition of a permit issued or adopted by the Director of Ohio EPA pursuant to those sections. Each day of violation constitutes a separate offense.

18. Pursuant to OAC Rule 3745-1-04(D), Taylor Creek shall be free from substances that enter the waters as a result of human activity in concentrations that are toxic or harmful to human, animal or aquatic life and/or are rapidly lethal in the mixing zone.
19. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the Permit -to-Install (PTI) requirements of ORC §§ 6111.44 and 6111.45 and OAC Rule 3745-42-02.
20. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purpose of ORC § 6111.

V. ORDERS

1. Within sixty (60) days of the effective date of these Orders, Respondent shall begin monthly monitoring for Chronic Toxicity using *Ceriodaphnia dubia* (reporting code 61426) and bimonthly monitoring using *Pimephales promelas* (reporting code 61428). Respondent shall also begin monthly monitoring for Acute Toxicity, using *Ceriodaphnia dubia* (reporting code 61425) and bimonthly monitoring using *Pimephales promelas* (reporting code 61427) at outfall 2IF00002001. All monitoring results shall be reported on Respondent's monthly operating reports (4500 forms).
2. If there are no exceedances of the WET values (as listed in Order No. 3) for nine (9) consecutive months, Respondent may revert back to quarterly sampling in accordance with the frequency listed in Respondent's current permit (2IF00002*JD) and using only *Ceriodaphnia dubia* (reporting codes 61425 and 61426).

3. Trigger to Initiate a Toxicity Reduction Evaluation (TRE):

Based upon evaluation of the data required in Order 1., Respondent shall notify Ohio EPA within five (5) days of receiving a monitoring result that exceeds the Whole Effluent Toxicity (WET) values of 0.44 TUa and 1.54 TUc at outfall 2IF00002001, in accordance with Section X of these Orders. Ohio EPA will determine if a TRE will be required of Respondent. A decision to require a TRE will be based upon professional judgment and the following decision criteria:

- A. Two or more tests in a six month period exceed 1.54 TUc in the outfall 2IF00002001 effluent;
 - B. Two or more tests in a six month period exceed 0.44 TUa in the outfall 2IF00002001 effluent;
 - C. A review of the test procedures for adequacy;
 - D. Evaluation of ambient toxicity data; and
 - E. Evaluation of supplemental information provided by Respondent.
4. Within thirty (30) days of being notified by Ohio EPA that a TRE will be required, Respondent shall initiate a TRE in order to meet the WET values of 0.44 TUa and 1.54 TUc at outfall 2IF00002001. Respondent shall comply with the following schedule:
- A. Within three (3) months of being notified by Ohio EPA that a TRE will be required, Respondent shall submit, in accordance with Section X of these Orders, quarterly reports detailing the progress and efforts made to meet the WET values. The quarterly reports shall include all biomonitoring results and any other relevant information obtained since the initiation of the TRE;
 - B. Within six (6) months of being notified by Ohio EPA that a TRE will be required, Respondent shall submit a specific plan detailing any necessary construction, process changes, or any other items required for the Facility to comply with the final WET values of 0.44 TUa and 1.54 TUc at outfall 2IF00002001. If WWTP improvements are necessary to comply with the final WET values, Respondent shall submit, in accordance with Section X of these Orders, a complete and approvable PTI application, with detail plans.
 - C. Within twelve (12) months of being notified by Ohio EPA that a TRE will be required, Respondent shall implement the specific plan and initiate any construction required to comply with the final WET values.
 - D. Within twenty-four (24) months of being notified by Ohio EPA that a TRE will be required, Respondent shall attain compliance with the final WET values of 0.44 TUa and 1.54 TUc at outfall 2IF00002001.

5. Trigger to Require a General Plan for Wastewater Treatment Plant Improvements:

Based upon evaluation of monthly operating reports, a general plan for wastewater treatment plant improvements will be required, if Respondent meets the following criteria for Significant Noncompliance for violations of NPDES permit limits:

- A. Chronic Violations. Sixty-six percent (66%) or more of the measurements exceed the same daily maximum limit or the same average limit in a six month period.
- B. Technical Review Criteria (TRC). Thirty-three percent (33%) or more of the measurements exceed the same daily maximum limit or the same average limit by more than the TRC in a six month period.
 - i. TRC = 1.4 or 40% for TSS, BOD and CBOD
 - ii. TRC = 1.2 or 20% for all other pollutants

6. Within six (6) months of being notified by Ohio EPA that a general plan is required, Respondent shall submit to Ohio EPA for approval a general plan for WWTP improvements necessary to achieve and maintain consistent compliance with its currently effective NPDES permit. At a minimum, the general plan shall include:

- A. The identification of the source(s) contributing to final effluent violations.
- B. Technical justification of any necessary changes in effluent treatment, WWTP operation, or WWTP upgrades required to eliminate violations of NPDES permit No. 2IF00002*JD.

7. Within nine (9) months of being notified by Ohio EPA that a general plan is required, if the general plan in Order No. 5 should indicate that a PTI is necessary for such improvements, Respondent shall submit, in accordance with Section X of these Orders, a complete and approvable PTI application, with detail plans for WWTP improvements;

8. Within twelve (12) months of being notified by Ohio EPA that a General Plan is required, if the general plan in Order No. 5 should indicate that a PTI is necessary for such improvements, Respondent shall initiate construction of the approved WWTP improvements; and

9. Within thirty (30) months of being notified by Ohio EPA that a General Plan is required, if the general plan in Order No. 5 should indicate that a PTI is necessary for such improvements, Respondent shall complete construction of

the approved WWTP improvements and achieve compliance with the final effluent limitations in its currently effective NPDES permit;

10. Respondent shall pay to Ohio EPA seventy four thousand four hundred twenty dollars (\$74,420.00) in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to Chapter 6111 of the Ohio Revised Code. Within thirty (30) days after the effective date of these Orders, payment to Ohio EPA shall be made by an official check made payable to "Treasurer, State of Ohio" for fifty nine thousand five hundred thirty six dollars (\$59,536.00) of the total amount. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to:

Office of Fiscal Administration
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

A photo copy of the check shall be sent to Ohio EPA's Northwest District Office at:

Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402
Attn: Enforcement Coordinator

11. In lieu of paying the remaining \$14,884.00 dollars of civil penalty, Respondent shall within thirty (30) days of the effective date of these Orders, fund a Supplemental Environmental Project (SEP) by making a contribution in the amount of fourteen thousand eight hundred eight four dollars (\$14,884.00) to the Ohio EPA's Clean Diesel School Bus Fund (Fund 5CD). Respondent shall tender an official check made payable to "Treasurer, State of Ohio" for that amount. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

A copy of each check shall be sent to James A. Orlemann, Assistant Chief, SIP Development and Enforcement, or his successor, at the following address:

Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, OH 43216-1049

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is defined in OAC Rule 3745-33-03(D)(1).

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to activities occurring on or at the Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402
Attn: Enforcement Coordinator

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

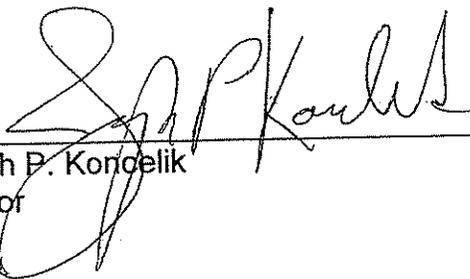
XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

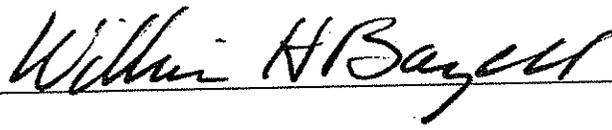
IT IS SO ORDERED AND AGREED:
Ohio Environmental Protection Agency



Joseph P. Koncelik
Director

11/7/05
Date

IT IS SO AGREED:
Durez Corporation



By

10/20/05
Date

William H Bazell
Print Name

Director of Manufacturing
Title

Attachment 1

Table of Final Effluent Violations
 Durez Corporation Outfall 2IF00002001

Date	Parameter	Reported	Limit	Limit Type
10/27/2004	CBOD 5 Day	39.856	18	Loading
10/27/2004	CBOD 5 Day	39	15	Concentration
10/20/2004	CBOD 5 Day	37.3958	18	Loading
10/20/2004	CBOD 5 Day	38	15	Concentration
10/13/2004	CBOD 5 Day	29	15	Concentration
10/13/2004	Suspended Solids	183	177	Concentration
10/13/2004	CBOD 5 Day	27.4412	18	Loading
10/13/2004	BOD	260	136	Concentration
10/13/2004	Suspended Solids	51	45	Concentration
10/7/2004	CBOD 5 Day	50	15	Concentration
10/7/2004	BOD	190	136	Concentration
10/7/2004	CBOD 5 Day	34.065	18	Loading
10/7/2004	Suspended Solids	50	45	Concentration
10/1/2004	CBOD 5 Day	34.6895	12	Loading
10/1/2004	Suspended Solids	121.75	58	Concentration
10/1/2004	Suspended Solids	34.6138	33	Loading
10/1/2004	BOD	166.25	51	Concentration
10/1/2004	BOD	45.3253	29	Loading
10/1/2004	CBOD 5 Day	39	10	Concentration
10/1/2004	Suspended Solids	37.339	36	Loading
10/1/2004	Suspended Solids	42	30	Concentration

8/18/2004	CBOD 5 Day	18	15	Concentration
7/21/2004	Suspended Solids	225	177	Concentration
7/1/2004	Suspended Solids	90.25	58	Concentration
6/30/2004	CBOD 5 Day	37.3958	18	Loading
6/30/2004	CBOD 5 Day	38	15	Concentration
6/23/2004	Suspended Solids	170.779	100	Loading
6/23/2004	BOD	160	136	Concentration
6/23/2004	BOD	284.632	77	Loading
6/23/2004	CBOD 5 Day	48.4858	18	Loading
6/23/2004	CBOD 5 Day	61	15	Concentration
6/16/2004	CBOD 5 Day	44	15	Concentration
6/15/2004	CBOD 5 Day	48.7508	18	Loading
6/15/2004	BOD	99.924	77	Loading
6/15/2004	CBOD 5 Day	28	15	Concentration
6/11/2004	CBOD 5 Day	127.933	18	Loading
6/11/2004	BOD	200	136	Concentration
6/11/2004	BOD	333.08	77	Loading
6/11/2004	CBOD 5 Day	130	15	Concentration
6/2/2004	CBOD 5 Day	167.297	18	Loading
6/2/2004	BOD	102.195	77	Loading
6/2/2004	BOD	300	136	Concentration
6/2/2004	CBOD 5 Day	130	15	Concentration
6/1/2004	CBOD 5 Day	71.6437	12	Loading
6/1/2004	Suspended Solids	51.7157	33	Loading
6/1/2004	BOD	156.833	51	Concentration
6/1/2004	BOD	150.857	29	Loading

6/1/2004	CBOD 5 Day	71.8333	10	Concentration
5/28/2004	BOD	350	136	Concentration
5/28/2004	BOD	384.177	77	Loading
5/28/2004	CBOD 5 Day	141.559	18	Loading
5/28/2004	CBOD 5 Day	170	15	Concentration
5/23/2004	CBOD 5 Day	330	15	Concentration
5/23/2004	CBOD 5 Day	686.977	18	Loading
5/23/2004	BOD	790	136	Concentration
5/23/2004	BOD	1285.76	77	Loading
5/23/2004	Nitrogen, Ammonia (NH3)	3.53898	2.72	Loading
5/10/2004	BOD	546.175	77	Loading
5/10/2004	BOD	370	136	Concentration
5/9/2004	CBOD 5 Day	181.68	18	Loading
5/9/2004	CBOD 5 Day	120	15	Concentration
5/1/2001	BOD	738.705	29	Loading
5/1/2004	BOD	503.333	51	Concentration
5/1/2004	CBOD 5 Day	336.738	12	Loading
5/1/2004	CBOD 5 Day	206.666	10	Concentration
4/1/2004	Suspended Solids	73	58	Concentration
3/31/2004	CBOD 5 Day	48.9022	46	Loading
11/28/2003	Suspended Solids	89.0232	54	Loading
7/9/2003	CBOD 5 Day	52.1573	18	Loading
7/9/2003	CBOD 5 Day	26	15	Concentration
7/1/2003	CBOD 5 Day	15.9575	12	Loading
4/1/2002	CBOD 5 Day	56.1	46	Loading
6/12/2001	Chronic Toxicity, <i>Ceriodaphnia dubia</i>	2.1	1.5	Concentration

5/16/2001	pH	9.2	9.0	Loading
10/30/2000	CBOD 5 Day	19.3	18	Loading
10/30/2000	CBOD 5 Day	30	15	Concentration
9/20/2000	Oil & Grease	11	10	Concentration

Attachment 2

Table of Durez Violation Responses

Violation Reporting Date	Remedial Action Description
11/12/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Trial utilizing an Engulfed Air Floatation Unit (EAF) conducted the week of 11/8/2004 to remove solids from clarifier effluent. • EAF will continue to be used until process under control or a permanent change is made. • Polymer reduced to 1/3 of the previous level. • Received four truckloads of recycled sludge from Kenton WWTP to improve the aeration basin.
11/2/2004	<p><u>Proposed Study to Investigate:</u></p> <ul style="list-style-type: none"> • Settling characteristics of the mixed liquor suspended solids. • Effectiveness of existing clarifier and polymer doses. • Effects of polymer on BOD, CBOD and toxicity. • Effectiveness of an additional clarification unit or other treatment trains.
10/27/2004	<p><u>Pilot Study to Investigate:</u></p> <ul style="list-style-type: none"> • Settling characteristics of the mixed liquor suspended solids. • Effectiveness of existing clarifier and polymer doses. • Effects of polymer on BOD, CBOD and toxicity. • Effectiveness of an additional clarification unit or other treatment trains
10/22/2004	<p><u>Pilot Study to Investigate:</u></p> <ul style="list-style-type: none"> • Settling characteristics of the mixed liquor suspended solids. • Effectiveness of existing clarifier and polymer doses. • Effects of polymer on BOD, CBOD and toxicity. • Effectiveness of an additional clarification unit or other treatment

	trains
10/4/2004	<p><u>Pilot Study to Investigate:</u></p> <ul style="list-style-type: none"> • Settling characteristics of the mixed liquor suspended solids. • Effectiveness of existing clarifier and polymer doses. • Effects of polymer on BOD, CBOD and toxicity. • Effectiveness of an additional clarification unit or other treatment trains.
8/30/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Cleaned sample line at outfall 001. • Scheduled contractor cleaning of outfall 001 sump. • Investigating more stringent operating limits for COD and evaluating other potential indicators for CBOD.
8/3/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Replaced sampling line at outfall 601. • Cleaned outfall 601 sump. • Cleaned the sump and sample line at outfall 001.
7/9/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Reduced COD and phenol loading to system. • Introduced digested sludge back to aeration basin to reseed. • 7/2/2004 performed a carbon change-out on both carbon units.
6/30/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Reduced COD and phenol loading to system. • Introduced digested sludge back to aeration basin to reseed. • Contacted industrial experts to determine most effective way to recover biological activity. • 7/2/2004 performed a carbon change-out on both carbon units.
6/23/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Reduced COD and phenol loading to system. • Introduced digested sludge back to aeration basin to reseed. • Contacted industrial experts to determine most effective way to recover biological activity. • Scheduled a 7/2/2004 carbon change-out on both carbon units.
6/16/2004	<p><u>Remedial Actions:</u></p> <ul style="list-style-type: none"> • Replaced aerator with equivalent aerator. • Reduced COD and phenol loading to system. • Introduced digested sludge back to aeration basin to reseed. • Contacted industrial experts to determine most effective way to recover biological activity.
6/14/2004	<p><u>Remedial Actions:</u></p>

	<ul style="list-style-type: none">• Will review analytical results and follow-up with Ohio EPA.
5/23/2004 & 5/28/2004	<p style="text-align: center;"><u>Remedial Actions:</u></p> <ul style="list-style-type: none">• Replaced aerator with equivalent aerator.• Reduced COD and phenol loading to system.• Introduced digested sludge back to aeration basin to reseed.• Contacted industrial experts to determine most effective way to recover biological activity.
5/9/2004	<p style="text-align: center;"><u>Remedial Actions:</u></p> <ul style="list-style-type: none">• Replaced aerator with equivalent aerator.• Reduced COD and phenol loading to system.• Introduced digested sludge back to aeration basin to reseed.• Contacted industrial experts to determine most effective way to recover biological activity.
3/31/2004	<p style="text-align: center;"><u>Remedial Actions:</u></p> <ul style="list-style-type: none">• Reduced storm water flow from 90 gpm to 70 gpm.