

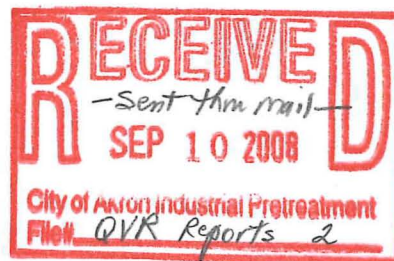
Richard A. Merolla
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DONALD L. PLUSQUELLIC
Mayor



September 10, 2008

Ohio Environmental Protection Agency
Pretreatment Unit
P.O. Box 1049
1800 Watermark Drive
Columbus, Ohio 43216-1049

Subject: Quarterly Violation Report, QVR-2008 (2)
City of Akron, Industrial Pretreatment Program

To Whom It May Concern:

Please find enclosed the Quarterly Violation Report (QVR) for the City of Akron, Industrial Pretreatment Program for the period of April 1, 2008 through June 30, 2008. During this reporting period there were five(5) industries in Significant Noncompliance (SNC) according to 40 CFR 403.8 (f) (2) (VII) for discharge or reporting violations. The end date of June 30, 2008 was used for calculating significant noncompliance.

Resolution and current enforcement status for each of the industries in violation in the second quarter of 2008 are shown on the enclosed QVR. The status of industries in SNC are summarized as follows:

- ◆ Beringer Plating Company – (MA-002) – SNC for Technical Review Criteria (TRC) violations of Chromium(T) monthly average limits on 50% of measurements during the evaluation period. Operator error, as a result of deficient operating procedures caused the violation. The procedure was revised effective 6/24/2008. A self-monitoring sample collected 6/18/2008 showed a return to compliance. The SIU paid a fine of \$1,200 to resolve the violations.
- ◆ Lockheed Martin MS2 - DSS – (MA-004) – SNC for TRC violations of Chromium(T) monthly concentration average limits on 50% of measurements and for violations of the Chromium monthly concentration average limits on 75% of measurements during the evaluation period. In all of the violations excessive chromium concentrations from plating process without wastewater pretreatment was the cause for the chromium violations. The SIU is instituting manual pollution prevention measures to reduce chromium in their discharge, paid a fine of \$3,700 and will pay an additional fine of \$5,000 by September 29, 2008 to resolve the violations.

- ♦ GMP Friction Products – (SI-007) – SNC for violations of Lead monthly concentrations on 66.67% of measurements during the evaluation period. The lead limit violations were caused by inadequate removal by the ion exchange pretreatment equipment. Operating conditions were adjusted to increase the efficiency of the resins to prevent further violations. In addition, the SIU paid a fine of \$400 to resolve the violations.
- ♦ Hayes Lemmerz International, Ohio, Inc. – (SI-010) – SNC for pH violations that occurred on 52 separate days during the fourth quarter of 2007. The primary cause for the violations was a deficient neutralization system. The industry was issued a Compliance Schedule in January to address the deficiencies by the end of August of 2008. On August 18, 2008 the SIU submitted a Final Compliance Report indicating that pH neutralization system installation was completed at a total cost of \$231,919.
- ♦ Heritage Industrial Finishing Corp. – (MI-035) – SNC for TRC violations of Zinc monthly average limits on 33% of monthly average measurements during the evaluation period. The zinc violations were caused by treated water allowed to sit for several days. The pH dropped during that time, allowing zinc to re-dissolve into the supernatant. The SIU changed procedures to require measuring the pH of the supernatant immediately prior to discharge to prevent recurrence of these circumstances. The IU paid a fine of \$200 to resolve the violations.

If you should have any questions regarding this information or the enclosed, please feel free to contact me at (330) 928-1164 x 487.

Sincerely,



Frederick A. Neugebauer, P.E.
Industrial Pretreatment Engineer
Water Pollution Control Division

FAN:mld

Enclosures

c: Donna Kniss Ohio-EPA w/enclosure
Richard A Merolla
Michael McGlinchy
Brian Gresser
Mark Albrecht, Economic Development
David Burdge
File: QVR-2008 (2)

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-001 The Akron Plating Company, Inc. 1774 Hackberry Street Akron, Ohio 44301-2403	<i>*** Recurring Cr(T) violations from previous quarter</i>	N	7/29 Fax from IU - Results from additional sampling shows compliance with Cr(T) limits on 7 of 10 samples taken during six month period ending June 30, 2008	Status: Compliance. Issues related to the finding of SNC for Chronic and TRC violations of Cr(T) daily limits have been resolved.

IU (Industrial User)

Fax (Facsimile)

DV (Discharge Violation)

FR (Failure to Report)

SIU (Significant IU)

Telecom (Telephone Communications)

IDV (Isolated DV)

FRCR30 (FR Periodic Compliance Report > 30 days)

EA (Enforcement Action)

AAH (Administrative Adjustment Hearing)

RDV (Recurring DV)

FRVN24 (FR Violation Notification > 24 hours)

VL (Violation Letter)

AI (Annual Inspection)

SDV (Significant DV)

FRVR7 (FR Violation Report > 7 days)

IR (Industrial Response)

SNC (Significant Noncompliance)

ISDV (Isolated, SDV)

PT (Pretreatment Equipment)

VN (Violation Notification)

SMR (Self Monitoring Report)

RSDV (Recurring, SDV)

SPCC (Spill Plan)

VR (Violation Report)

CMR (City Monitoring Report)

SMRDI (Deficient SMR, Isolated)

IPP (Industrial Pretreatment Program)

Ltr (Letter)

TRC (Technical Review Criteria)

SMRDR (Deficient SMR, Recurring)

** (carry over from previous QVR's)

Cert (Certified)

OCAPP (Office of Compliance Assistance and Pollution Prevention)

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-002 Beringer Plating, Inc. 1211 DeValera Avenue Akron, OH 44310-2417	5/28 IDV Cd = 1.075 mg/L, Limit = 0.5 mg/L 5/29 RDV Cd = 2.007 mg/L, Limit = 0.5 mg/L 5/30 RDV Cd = 0.596 mg/L, Limit = 0.5 mg/L May RDV Cd _{AVG} =0.816 mg/L, Limit = 0.26 mg/L	Y	6/10 e-mail - Preliminary NOV 6/11 Phone call from SIU - SIU trying to determine cause. 7/2 VL - IR Due by 7/25 - Pay fine of \$1,200 - Report on Cause for violation and Corrective Action taken to resolve the violation 7/16 SMR for 1 st Half of 2008 - 6/18 resample indicates return to compliance on Cd discharge levels. 7/24 IR - Fine paid - Cause: Operator error because of deficient operating procedure. - Corrective Action: Revised procedure effective 6/24/2008	Status: SNC for TRC violations on 50% of measurements for compliance with Cd average limits for period ending the 2 nd quarter of 2008.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-004 Lockheed Martin MS2 – DSS 1210 Massillon Road Akron, OH 44315	3/11 IDV Cr=2.20 mg/L, Limit = 2.00 mg/L 3/12 RDV Cr=2.31 mg/L, Limit = 2.00 mg/L 3/13 RDV Cr=2.39 mg/L, Limit = 2.00 mg/L March RDV Cr _{AVG} =2.30 mg/L, Limit=1.71 mg/L 4/28 SDV pH=2.92 S.U., Limit=5.0-11.5 S.U. 4/29,RSDV pH=2.56 S.U., Limit=5.0-11.5 S.U. 5/7 IDV Cr=2.69 mg/L, Limit = 2.00 mg/L 5/8 RDV Cr=2.23 mg/L, Limit = 2.00 mg/L 5/13 RSDV pH=2.35 S.U., Limit=5.0–11.5 S.U. 5/14 RDV Cr=2.86 mg/L, Limit = 2.00 mg/L 5/14 RSDV pH=2.3 S.U., Limit=5.0-11.5 S.U. May RDV Cr _{AVG} =2.19 mg/L, Limit=1.71 mg/L	Y	3/20 Telecom - IU Reporting Cr Violations 3/23 Ltr - VR for Cr Violations 4/23 Ltr - Follow-up - 3/11-13 Cr violations caused by excessive carry over with poly basket. - Discontinued use of poly basket 5/20 Telecom - IU Reporting 4/28 – 5/14 pH and Cr Violations - 5/28 Ltr - Follow-up on 4/28-5/14 selfmon violations - Violations caused by higher volume of production. IU investigating options. 6/10 E-Mail - Preliminary NOV for 5/7-8 Cr violations 6/20 VL - IR due 7/18 - Fine: \$3700 - Explain cause and corrective measures taken or needed.	Status: Significant Non-compliance SNC for TRC violations of Chromium Avg Limit on 2 of 4 Concentration Average Results. SNC for Chronic violations of Chromium Avg Limit for violations on 3 of 4 Concentration Average Results

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-004 <i>(continued)</i>	6/4 RDV pH=2.7 S.U., Limit=5.0-11.5 S.U. 6/5 RDV Cr=2.8 mg/L, Limit = 2.00 mg/L 6/5 RSDV pH=2.61 S.U., Limit=5.0-11.5 S.U. 6/6 RSDV pH=2.59 S.U., Limit=5.0-11.5 S.U. 6/11 RSDV pH=2.68 S.U., Limit=5.0-11.5 S.U. June RDV Cr _{AVG} =1.9 mg/L, Limit=1.71 mg/L		6/25 IR <ul style="list-style-type: none"> - IR to 6/10 preliminary NOV - VR for Cr & pH exceedences on Selfmon June 4,5,9 & 11. - Cause: Excessive Carry over - Interim response: spray mist over plating tank to minimize carr-over - Long-term options being investigated. 7/17 Mtg at IU <ul style="list-style-type: none"> - IU paid fine for 6/20 NOV - Presented results of investigation of long-term options. - IU proposing completion of pH neutralization PTI, but using manual pollution prevention techniques to address Cr issues. - Items yet to be completed. 8/6 VL <ul style="list-style-type: none"> - To address violations incurred during June. - Fine: \$5,000 - Submit Corrective Action Plan - Response due by 9/29/2008 8/15 Telecom w/ 8/18 follow-up	

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-007 Universal Plating, Inc. 478 Morgan Avenue Akron, Ohio 44311-2470	*** <i>Cu, Ni, Pb & Cr and Deficient Report violations from previous quarter</i>	N	*** <i>No violations this Quarter</i>	Status: Compliance SNC Resolved in previous quarter. IU has become a Zero Discharge Metal Finishing Industry.
MA-015 ELIOKEM, Inc. 1380 Techway Drive Akron, Ohio 44306-2572	*** <i>Recurring "Spill or Operational Upset not resulting in PT/I/SC" from 1st & 2nd quarters of 2007.</i> 5/5 Isolated spill or Operational Upset not resulting in PT/I/SC.	N	5/6 Telecom - Spill Notification 5/12 E-mail w/attached Spill Report - Spill Report - Foaming caused by normal operations - IU is using the incident to inform their understanding of what situations cause foam. - Follow-up hardcopy received 5/14	Status: Non-Compliance on Recurring Spill violations pending completion of Corrective Action Plan.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-016 Meggitt Aircraft Braking Systems 1210 Massillon Road Akron, OH 44315	5/8 IDV Cr=2.60 mg/L, Limit = 2.00 mg/L	N	5/12 E-mail to IU - Preliminary NOV 6/16 Violation verified 7/2 VL - IR due 8/1 - Explain cause and corrective measures taken or needed. 7/30 IR - Violation caused by excessive carry over from plating bath. - Dead rinse tank installed after plating bath to reduce carryover getting to sewer.	Status: Non-Compliance at the end of the quarter Compliance was achieved 7/30.
SI-002 Summa Health System/Akron City Campus 525 East Market Akron, Ohio 44304-1619	*** <i>Recurring Hg violation and Recurring Failure to Report violations from previous quarters</i> 6/18 FR IU failed to submit report on effort to determine source of Hg.	N	4/22 IR - Payment of fine for 2/15/2008 NOV - FRVN and FRVR occurred because of delay in receiving Lab Report. Source of Hg violation not determined. Steps being taken to determine source. Results to be submitted within 60-days. 7/30 Telecom to IU - Per IU effort not yet complete 8/20 VL - EA for 6/18 FR - SNC for failure to Report < 30 days as of 7/18 (3 rd Quarter) cited. - Fine: \$500. - IR due by 9/19.	Status: Non-Compliance. SNC occurred during 3 rd quarter. The IU will be cited accordingly.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
SI-005 Children's Hospital Medical Center of Akron One Perkins Square Akron, OH 44308-1063	5/23 IDV Hg=11.3 µg/L, Limit=5.0 µg/L	N	6/23 e-mail from IU - IU Notified IPP of Hg Violation - Non-representative sample site 7/18 Written NOV - By 8/18 IU to submit a corrective action schedule to provide a sample location for the outfall that will enable representative sampling - All necessary actions must be completed by 11/16.	Status: Non-compliance. IU must provide a representative sampling location.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
SI-007 GMP Friction Products fka The General Metals Powder Co. 130 Elinor Avenue Akron, Ohio 44305-4116	April IDV Pb _{avg} =0.45 mg/L, Limit=0.43 mg/L 5/16 FRVN24 5/23 FRVR7 5/28 IDV Cu=2.34 mg/L, Limit=2.00 mg/L May RDV Pb _{avg} =0.47 mg/L, Limit=0.43 mg/L	Y	6/10 e-mail to IU - PNOV for 5/28 Cu violation 7/18 VL - NOV for 5/28 Cu and May Pb _{AVG} violations from City Monitoring - Cited as Isolated Violations - IR due 8/15 - IU to report: 1.) Explanation as to possible causes of the violations; 2.) Steps taken or required to resolve the recurring violations along with completion dates of each completed or proposed activity. 7/23 Selfmon - April Pb _{avg} violation noted - Lab report indicates IU received data before the end of May. 7/25 VL & e-mail - NOV - Cited April Pb _{avg} violation as isolated. - Re-cited May Pb _{avg} violation as recurring - Cited cause for SNC - Cited for FRVN24 and FRVR7 for failure to report April Pb _{avg} as required by permit - Fine: \$400 - IU to report on cause and correction of Pb violations - IR due 8/22 ***Chronology continued on following page	SNC for violations of Pb _{avg} Limits on 66.67 % of measurements. Compliance achieved on 8/28 with report on resin/ph efficiency efforts.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
SI-007 <i>(continued)</i>			8/15 e-mail from SIU - IR for VLs dated 7/18 & 7/25 - Cu violation caused by operator error. Updated procedure including oversight to prevent recurrence. - Pb violation caused by PTE not operating adequately. pH of waste to ion exchange increased to increase efficiency of resins. - IU continuing our tests and hope to confirm the positive preliminary results in the near future (by September 1,2008) 8/19 Ltr - Hardcopy of IR hand delivered by IU 8/19 E-mail to IU - IU to report on results of tests to enhance efficiency of Pb removal. - IR due 9/5 8/28 IR - Tests confirmed increased efficiency	

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
SI-010 Hayes Lemmerz International, Ohio, Inc. 428 S Seiberling St Akron, Ohio	*** Consent Order Violations *** Recurring pH violations form <i>previous quarter and FRVN and</i> <i>FRVR from 4th quarter of 2007.</i> 4/22 IDV Zn=2.49 mg/L, Limit=2.03 mg/L	Y	5/7 E-Mail to IU - Preliminary NOV 6/24 Mtg at WPCS - Quarterly Compliance Order Progress Meeting and PTI Update 6/25 Violation verified 6/27 VL - Explain cause and corrective measures taken or needed. - IR due 7/27 6/30 IU in compliance with all Compliance Order Schedule requirements, including sampling and reporting requirements during the 2 nd quarter of 2008. 7/24 Ltr from IU - IR to 6/27 NOV 8/6 Ltr from IU - Compliance Schedule Milestone Report - Final Compliance anticipated by 8/12 8/18 Ltr from IU - Compliance Schedule – Final Report - Final Compliance achieved 8/14 - Total cost for PTI: \$231,919	Status: SNC for pH violations IU Operating under the terms of a Consent Order dated 10/31/2007 to conclude in 11/30/2009 pending satisfactory performance by IU. IU also Operating under the terms of a Compliance Schedule to resolve the pH violations by 8/31/2008. 4/22 Zn violation is resolved as of 7/24

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
<p>SI-017 Akron Thermal, LP 226 Opportunity Parkway Akron, Ohio 44307-2232</p>	<p>*** Recurring pH violations from 1st & 2nd Quarter of 2007.</p> <p>4/22 RDV Zn=6.835 mg/L, Limit=3.50 mg/L</p> <p>4/23 RDV Zn=18.01 mg/L, Limit=3.50 mg/L</p>	<p style="text-align: center;">N</p>	<p>5/12 E-mail to IU</p> <ul style="list-style-type: none"> - Preliminary NOV for 4/22 & 4/23 Zn violations <p>6/25 CMR Completed</p> <ul style="list-style-type: none"> - Confirmed 4/22 & 4/23 Zn violations <p>7/2 VL</p> <ul style="list-style-type: none"> - NOV for 4/22 & 4/23 Zn violations - Fine: \$1000 - IU required to provide explanation as to possible causes of the recurring violations; and steps taken or required to resolve the recurring violations along with completion dates of each completed or proposed activity. <p>7/30 Ltr hand delivered by IU</p> <ul style="list-style-type: none"> - IR for 7/2 VL - Fine paid. - Violations caused by inavertable leakage coupled with poor housecleaning. Floors cleaned, increased monitoring and house cleaning associated with the leakage. 	<p>Status: Non-compliance for recurring pH violations. Consulting with Akron Law Department to determine appropriate response with respect to the bankruptcy filing, for which the IU just filed a reorganization plan.</p> <p>Zn violations resolved</p>

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MI-009 Chemionics 390 Munroe Falls Rd Tallmadge, OH 44278-3338	4/17 IDV Zn=8.00 mg/L, Limit = 3.50 mg/L 4/18 RDV Zn=16.73 mg/L, Limit = 3.50 mg/L	N	5/7 E-mail to IU - Preliminary NOV 6/23 CMR Completed - Violations confirmed 7/17 VL - NOV - Fine: \$200 - IU required to provide explanation as to possible causes of the recurring violations; and steps taken or required to resolve the recurring violations along with completion dates of each completed or proposed activity. 8/8 Ltr from IU - IR to 7/17 NOV - Fine paid. - Violation caused by a pinhole leak in the attrition mill. - Corrective Action: Unit repaired, added visual inspection of mill to PM schedule. Information given to employees on importance of paying attention particularly when working with Zn containing products.	Status: Non-Compliance at the end of the Quarter. Compliance was achieved 8/8.

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MI-035 Heritage Industrial Finishing Corp. 1874 Englewood Avenue Akron, OH 44312-1002	5/6 IDV Zn=3.27 mg/L, Limit=2.61 mg/L May RDV Zn _{AVG} =2.68 mg/L, Limit=1.48 mg/L	Y	5/12 E-mail to IU - Preliminary NOV 6/24 CMR Completed - Violations confirmed 7/24 VL - NOV - Fine: \$200 - IU required to provide explanation as to possible causes of the recurring violations; and steps taken or required to resolve the recurring violations along with completion dates of each completed or proposed activity. 8/8 Ltr from IU - IR to 7/24 NOV - Fine paid - Violation caused by treated water allowed to sit for several days dropping in pH, redissolving Zn into solution. - In future IU will not allow as much time between treating and disposal, and also retest for pH right before discharging.	Status: SNC for TRC violations of Zn(T) average limits. The causes for the Zn violation have been addressed.
MI-101 Akron Electric Inc. 1025 Eagon Street Barberton, OH 44203-1603	6/16 IDV Mineral O&G=75 mg/L, Limit=50 mg/L	N	7/7 Selfmon - Violation discovered - Cause of O&G violation and corrective action taken were reported. 7/17 VL - NOV for O&G violation - All issues addressed in Selfmon	Status: Non-Compliance at the end of the quarter. Compliance was achieved 7/17

INDUSTRIAL USER VIOLATION REPORT

POTW: City of Akron

Period Covered: April 1, 2008 through June 30, 2008

VIOLATIONS RESOLVED

FACILITY NAME AND ADDRESS	DESCRIPTION OF VIOLATION(S)	SNC (Y/N)	CHRONOLOGY OF ENFORCEMENT EVENTS	COMMENTS
MA-003 Emerald Performance Materials, LLC 240 W. Emerling Ave. Akron, Ohio 44301-1620	*** pH violation from 1 st Quarter of 2008	N	*** No violations this Quarter	Status: Resolved
SI-001 Akron Anodizing & Coating Co 1066 Home Avenue Akron, Ohio 44310-3502	*** Recurring Copper violations from 1 st Quarter of 2008	N	*** No violations this Quarter	Status: Resolved
SI-021 Cuyahoga Falls Hospital 1900 23rd Street Cuyahoga Falls, OH 44223-1404	*** Hg violations from previous quarter.	N	*** No violations this Quarter	Status: Resolved

The Summit County Environmental Services reported compliance statuses of the industries in the Summit County Program discharging to the Akron WPCS. Summit County report is attached if received before reporting deadline, otherwise it will follow under separate cover. Unresolved violations will be carried over into the next quarterly violation report.