



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 4 2005

CERTIFIED MAIL 7004 1160 0000 8848 7574
RETURN RECEIPT REQUESTED

Mr. David Denner, Chief Executive Officer
Coronet Industries, Incorporated
4082 Coronet Road
Plant City, Florida 33566

SUBJ: Coronet Industries Incorporated
Plant City, Florida

Dear Mr. Denner:

Enclosed are the reports for the December 9-11, 2003, water program inspections, conducted by the United States Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP) at Coronet Industries Incorporated (CII). The Agencies acknowledge that CII ceased production operations in March 2004, and it has addressed several of the concerns stated in the reports.

If you have any questions or comments, please contact me at (404) 562-9742.

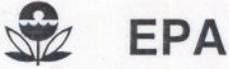
Sincerely yours,

A handwritten signature in cursive script that reads "Arthur L. Collins".

Arthur L. Collins, Chief
Gulf Enforcement Section

Enclosures

cc: Tim Webster, Sidley Austin Brown & Wood
Steven Baer, DOJ
Timothy Parker, FDEP



United States Environmental Protection Agency
 Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved
 OMB No.2040-0057 Approval
 Expires
 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Facility Type
N	FLR05B172	03/12/09	W	J	2

Remarks

Inspection Work Days Facility Self Monitoring Evaluation Rating B1 QA -----Reserved-----

Section B: Facility Data

Name and Location of Facility Inspected Coronet Industries Inc. 4082 Coronet Road Plant City, Hillsborough County, FL	Entry Time/Date 9:30 AM 12/9/03	Permit Effective Date 3/11/01
	Exit Time/Date: 5:00 PM 12/10/03	Permit Expiration Date: 3/10/06

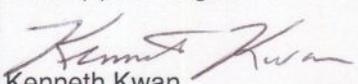
Names of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Weinstein, Counsel Coronet Industries Inc. 813/224-9100	Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Jim Baker, P.E., Environmental Manager 813/752-1161 Contacted Tel. Yes X No	

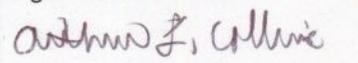
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations & Maintenance	CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	Self-Monitoring Program	Sludge Handling/Disposal	Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	Compliance Schedules	Pretreatment	Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving	Laboratory	<input checked="" type="checkbox"/> Storm Water/SWPPP	Other: Sampling

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklist as necessary)

See Attachment

Name(s) and Signatures of  Kenneth Kwan	Agency/Office/Phone and Fax Numbers US EPA/Gulf Enf. Sect./ 404-562-9752 FAX:404-562-9728	Date 12/21/04
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Signature of Reviewer  Arthur Collins, Chief	Agency/Office Gulf Enforcement Section, US EPA / 404/562-9742	Date 12/21/04
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On December 9 - 10, 2003, Mr. Kenneth Kwan performed a Compliance Evaluation Inspection (CEI) of the Coronet Industries, Inc. (Coronet facility). Participating in the inspection were Charles Kovach of the Florida Department of Environmental Protection (FDEP), and Fred Nassar of the Environmental Protection Commission of Hillsborough County. The purpose of the inspection was to evaluate Coronet's compliance with the terms and conditions of its storm water Multi Sector General Permit (MSGP) Number FLR05B172. During the inspection, EPA requested the following: Storm Water Pollution Prevention Plan (SWPPP); sampling and training records; spills and leaks records; and the facility's inspection reports. Records that were not available, and a copy of the SWPPP were submitted to EPA on March 23, 2004, as a supplemental response to a request for documents. The results of this inspection are based upon the findings during the on-site inspection, and a record review of the documents later submitted to EPA.

Background:

The facility encompasses approximately 1,000 acres. However, only a 5-acre section located in the Midwestern portion of Coronet Road are covered under the MSGP. The MSGP addresses storm water runoff associated with industrial activity which discharges from the site. Coronet primarily manufactures a phosphatic animal feed supplement from phosphate rock, phosphoric acid, sodium hydroxide, and soda ash. The Coronet facility operates under Sector U (Food and Kindred Product Facilities - SIC code 2048 - Grain Mill Products) of the MSGP with storm water discharge requirements issued by the FDEP. The permit authorizes discharge from three separate outfalls (006, 007, and 008). Storm water which comes in contact with this industrial activity, drains to the West side of the facility and discharges through outfalls 006 and 007 across Coronet Road and into English Creek via Howell's Branch. Outfall 008 is for emergency use only and discharges to Hillsborough County's unnamed ditch. Storm water discharges from outfalls 006 and 007 are monitored once per quarter for flow and Total Suspended Solids in years two and four of the permit issuance date. Storm water runoff from the remainder of the facility and industrial activity associated with potassium fluoborate (KBF4) for the aluminum industry is contained and recycled by various perimeter ditches and a series of pond systems onsite according to the SWPPP, dated February 11, 1998, and revised August 31, 2001. If these conditions exist, then no MSGP for storm water discharges is needed for a closed loop system. However, the SWPPP did not discuss what engineering studies and/or hydraulic calculations were used to make a conclusion that no storm water discharged to surface water from the KBF4 or the remainder of the facility's property. The KBF4 is one of the industries that require an MSGP under Sector C (Chemical and Allied Products Manufacturing Facilities - SIC code 2819 - Industrial Inorganic Chemicals). At the time of the inspection, EPA could not make an independent field verification that no storm water discharged from the KBF4 area due to the lack of rainfall to determine the direction of the storm water runoff.

Facility site review:

The facility's personnel made available during the inspection were not able to identify the exact location of the storm water outfalls (006, 007 and 008) and sampling points. Also, the facility's personnel were not able to describe how flow data was calculated or what instruments were used, if any, to measure storm water flow. Without this information, EPA was not able to determine whether storm water samples were taken in accordance with the locations identified in the SWPPP, or to evaluate whether the locations and discharges are representative of the industrial discharge from the facility. Coronet did not make available the personnel with intimate knowledge of the storm water operations during the time of this inspection who could have discussed and clarified these concerns.

SWPPP development:

1. Part XI.U.3 of the MSGP requires Coronet to develop a SWPPP which prevents, or minimizes the potential for: the release of pollutants from ancillary activities (including material storage areas; plant site runoff; in-plant transfer; process and material handling areas; loading and unloading operations; and sludge and waste disposal areas) to the waters of State through plant site runoff; spillage or leaks; sludge or waste disposal; or drainage from raw material storage. The SWPPP developed by Coronet, dated February 11, 1998, and revised August 31, 2001, is deficient. Worksheet #3A of the SWPPP list five significant materials (Underground Wet Phosphate Rock, Borax, Soda Ash, and Potassium Chloride) that are exposed to storm water. However, the site map in Appendix A of the SWPPP failed to identify the locations of any of these significant exposed materials as required by Part XI.U.3.a(2)(a) of the MSGP.
2. Worksheet #5 of the SWPPP required Coronet to assess any non-storm water discharges. This assessment must be certified and signed by a responsible corporate official. The non-storm water discharge assessment and certification was not signed and dated in accordance with Part VII.G of the MSGP.
3. The SWPPP proposed visual monitoring of storm water each quarter, during the second and fourth year of the permit. This schedule is inconsistent with Part XI.U.5.b(1)(a) of the MSGP which requires a quarterly visual examination of storm water quality every quarter for the life of the permit.
4. The SWPPP stated that storm water runoff from the KBF4 production area is recycled back to the treatment ponds via various perimeter ditches. The KBF4 is one of the industries that require an MSGP under Sector C (Chemical and Allied Products Manufacturing Facilities - SIC code 2819 - Industrial Inorganic Chemicals). It is unclear what kind of engineering studies and/or hydraulic calculations were used to make a conclusion that no storm water discharged to surface water from the KBF4 or the remainder of the facility's property.

5. The supplemental response to a request for documents submitted to EPA on March 23, 2004, indicated nine incidents of acid spills and overflows, and eight incidents of acid leaks during May 10, 2002 to October 18, 2003, at areas outside of the current 5 acres MSGP bounty. It is unclear from these records whether any of the spills, leaks, and overflows ever reached the storm water outfalls or discharged off site. The SWPPP listed no spills for the past three years.

SWPPP implementation:

1. Part XI.U.3.a(3)(d) of the MSGP requires a qualified facility personnel to conduct regularly scheduled inspections of equipment and areas where the potential for exposure to storm water exists. A set of tracking, followup procedures, and records of inspections must be maintained and incorporated in the SWPPP. Based on a review, there were no records of these routine inspections in the SWPPP.

2. Part XI.U.3.a(3)(e) of MSGP requires an employee training program be provided annually. There was no documentation that any training on spill prevention and response, good housekeeping, and material management practices were conducted since January 1998 as noted on Worksheet #9 of the SWPPP. Worksheet #9 failed to contain information on any training schedules, nor a list of employees who attended training sessions.

3. Part XI.U.3.a(4) of MSGP requires an annual comprehensive site compliance evaluation. Appendix C of the SWPPP contains an Annual & Interim Evaluation forms. These annual inspection forms must be retained as part of the SWPPP for at least three years from the date of evaluation (Part XI.U.3.a(4)(c)). There were no records or documentation that these annual inspections were performed in the past three years from reviewing the SWPPP.

4. Part XI.U.5.a and Part XI.U.5.b of MSGP requires analytical monitoring and reporting of storm water data for outfalls 006, 007 and 008. Storm water discharges must be monitored once per quarter during the second year of the permit. The year two monitoring result period began in January through December 2002. Monitoring results must be submitted on a Discharge Monitoring Report (DMR) form to FDEP by March 31, 2003. As part of the inspection, EPA asked for DMRs for the year 2002, and the laboratory bench sheet that were used to generate the DMR data. Coronet was not able to produce any storm water sampling data to EPA. From reviewing the March 23, 2004, supplemental response to a request for documents, storm water sampling was not conducted for year two as required by the MSGP. In the past experience, Coronet has similar non-sampling and failures to submit DMRs. In response to these violations, EPA issued an Administrative Order No. 2000-088 on July 17, 2000, ordering the submittal of DMRs.

documents to EPA.

Recommended Actions:

Coronet should develop a procedure for developing, retraining, and producing records on the status and the effectiveness of the SWPPP implementation. Records and record keeping should include, but not be limited to sampling data, the facility's routine and annual inspection logs, and employee training records.

The SWPPP should be amended to address the current conditions at the facility. If Coronet is moving toward shutdown and to a decommissioning mode of operation, the SWPPP should be amended to address storm water runoff related to this activity. The amendment should focus on the good housekeeping and preventative maintenance section of the SWPPP to address storm water runoff relating to removal of raw materials, products, residuals, and equipments. Any cleaning of equipment and wash down of the industrial processing area need to be addressed in the management of runoff section of the SWPPP. The final SWPPP should address BMP (structural and non-structural controls) to all areas with the greatest potential of contact with storm water discharge. Also, any major land disturbance activities over one acre relating to closure of the ponds and regrading of the ditch system need to be permitted by FDEP under the NPDES general construction permit. Finally, a new employee training program should be developed to address spill prevention and response, good housekeeping, and ways to minimize contact of these exposed materials with storm water during any shutdown and decommissioning process if this occurs.



EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Form Approved
OMB No.2040-0057
Approval Expires
8-31-98

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Facility Type
N	FL0034657	03/12/9-11	C	J	2

Remarks

Inspection Work Days Facility Self Monitoring Evaluation Rating **B1 QA -----Reserved-----**

Section B: Facility Data

Name and Location of Facility Inspected Coronet Industries Inc. 4082 Coronet Road Plant City, Hillsborough Co., FL 33564	Entry Time/Date 9:30AM / 12/09/2003	Permit Effective Date May 30, 1997
	Exit Time/Date: 5:30 PM / 12/11/2003	Permit Expiration Date: May 29, 2002*
Names of On-Site Representative(s)/Title(s)/Phone and David Weinstein, Counsel, Coronet Industries, Inc. / 813-224-9100	Other Facility Data * Permit administratively extended.	
Name, Address of Responsible Official/Title/Phone and Mr. Jim Baker, P.E., Environmental Manager/(813) 752-1161 Mr. John Broughton, Environmental Technician		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit		Flow Measurement	<input checked="" type="checkbox"/>	Operations & Maintenance		CSO/SSO (Sewer
<input checked="" type="checkbox"/>	Records/Reports	<input checked="" type="checkbox"/>	Self-Monitoring		Sludge Handling/Disposal		Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review		Compliance Schedules		Pretreatment		Multimedia
<input checked="" type="checkbox"/>	Effluent/Receiving		Laboratory		Storm Water		Other:

Section D: Summary of Findings/Comments

SUMMARY/DATA INTEGRITY

At the time of inspection, there were no permitted or unpermitted discharges observed during the inspection. Discharge Monitoring Reports (DMRs) that were spot checked against relevant bench sheets and/or laboratory reports did not reveal any discrepancy of significance. Several effluent limit exceedances are reported by Coronet Industries, Inc. to Florida Department of Environmental Protection (FDEP). The permittee was subject to a consent order, an amended consent order, and an immediate final order issued by the FDEP.

See attached for details.

Names and Signatures of 	Agency/Office/Phone and Fax Numbers EPA; 404-562-9746	Date 12/21/04
Signature of Reviewer 	Agency/Office Gulf Enforcement Section/WPEB/WMD/EPA	Date 12/21/04

Introduction:

On December 9, 2003, personnel from the United States Environmental Protection Agency, (EPA) Region 4, and the Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) at the Coronet Industries Inc. (Coronet) facility's wastewater treatment system, located in Plant City, Florida. The purpose of the CEI was to evaluate Coronet's compliance with its National Pollutant Discharge Elimination System (NPDES) permit #FL0034657 and its requirements for surface water discharges. At the time of entry, a letter from the U.S. Attorney's Office in Tampa, was hand delivered to John Broughton, an environmental technician for Coronet, requesting access to the facility and cooperation. EPA and FDEP personnel were requested to wait at the front gate until Coronet's attorney, David Weinstein, arrived on site. Finally, access was granted to conduct this CEI.

The following individuals participated in the inspection:

Chetan Gala, EPA, Region 4, (404) 562-9746

John Williams, EPA, Region 4, (706) 355-8735

Cynthia Falandysz, FDEP, (813) 744-6100x 391

Tim Parker, FDEP, (813) 744-6100

David B. Weinstein, Counsel, Coronet Industries, Inc.; Bales Weinstein, PA., (813) 224-9100

Coronet owns and operates an industrial facility located in Plant City, Florida, that manufactures tri-calcium phosphate, used as a chicken/animal feed supplement and potassium fluoborate (KBF_4) used in the aluminum industry. The facility covers over 950 acres and had approximately 100 employees while in operation. The wastewater system consist of several ponds/lagoons (ponds: 1, 2, 2A, 3, 4, 4A, 5, 6, 7, and 8), cumulatively averaging about 350 acres. The wastewater system receives the wastewater generated by the industrial facility, and the storm water.

Permit:

The Coronet facility operates under a NPDES permit #FL0034657, that was issued and effective on May 30, 1997, and was modified on December 11, 1997 and March 23, 1998. The permit expiration date was May 29, 2002, however, in accordance with Title 40 Code of Federal Regulation Part 122, Coronet timely submitted a complete permit application for reissuance of its NPDES permit. Thus, the permit is considered administratively extended.

The permit identifies only four outfalls that are permitted for discharges. Two of the four outfalls, 001 (located at pond 4A) and 005 (located at pond 5), are for discharges under normal operational conditions. The remaining two outfalls, 003 and 004 (both of whose location was not clearly identified during the inspection) are designated in the permit to discharge during emergency conditions only. However, the permit does not clearly identify the location of these outfalls.

Records/Reports:

At the time of the inspection, the following records were requested for review:

- NPDES permit, its modifications, and permit renewal application;
- Discharge Monitoring Reports (DMRs) for 2002 and 2003 along with at least four

- months of chain of custody, bench sheets and/or laboratory reports;
- 2003 FDEP inspections reports and Coronet's responses;
- FDEP Consent Order (CO), Amended Consent Order (ACO), and Immediate and Final Order (IFO);
- Operations and Maintenance records of the wastewater treatment system for 2003,
- Spill Prevention Control and Countermeasures (SPCC) Plan and relevant records for 2003; and
- Best Management Practices (BMP) Plan as prescribed at Part VII, Section D of the NPDES permit.

Coronet made available during the inspection the first four category items listed above. The BMP Plan and the SPCC Plan were not made available at the time of inspection but were later provided by Coronet in March 2004. In addition, only portions of the Operation and Maintenance Records were made available by Coronet during the inspection thus hampering EPA's ability to assess Coronet's required operation and maintenance activities. For example, EPA understands that Coronet uses temporary pumps and hoses to transfer wastewater and storm water among ponds. However, most of the records relating to this pumping activity were not made available at the time of the inspection. Portion of the documents that were made available at the time of inspection were copied and provided by Coronet to EPA in March 2004.

Self Monitoring Program:

During the period from January 2002 through October 2003, Coronet's DMRs indicated discharges from outfalls 001 and/or 005 in the months of August, September and December of 2002 and January, February, March, May, July, August, and September of 2003.

Coronet's DMRs reflect numerous effluent limitation violations most of which have not been addressed through an enforcement action.

The DMRs did not indicate discharges to English Creek from pond 7 and ditch #4 despite the fact that a FDEP inspection on July 24, 2003 documented such discharges occurring. FDEP's report for the July 24, 2003 inspection further notes a permanent control valve installed on the unpermitted discharge pipe located in ditch #4.

Further reporting discrepancies were identified by the fact that the DMRs did not report an additional unpermitted discharge to English Creek which was similarly documented by FDEP during a February 17, 2003 inspection. Such discharge occurred as a result of breached berm.

Coronet may have reported such unpermitted discharges through mechanisms other than DMRs. However, Coronet personnel with intimate knowledge of wastewater system operations were not made available to EPA during the inspection to discuss this issue.

The NPDES permit (refer to Part V, Section A, item 6 on page 8 of the permit) requires the permittee to monitor the level of wastewater in its ponds so that when the wastewater level exceeds the mid-point of the surge capacity of the water recirculation system, Coronet is to treat and discharge wastewater meeting limits prescribed in the permit. However, water level measuring devices in various ponds did not clearly indicate what water level constituted the mid-point of the

surge capacity¹. Therefore, it would not appear that Coronet would be able to accurately monitor such levels. In addition, documents made available to EPA at the time of inspection did not provide clarity as to whether Coronet was meeting this condition. Again, Coronet did not make available the personnel with intimate knowledge of the wastewater system operations that could have clarified this issue.

Site Review and Operation and Maintenance:

The site review was initiated following a brief meeting with Coronet's representative Mr. David B. Weinstein, Counsel, Coronet Industries, Inc., on the nature and scope of inspection. During this meeting EPA staff provided a list of documents and records to be made available for review. Mr. David B. Weinstein, indicated that Mr. John Broughton, the environmental technician with intimate knowledge of the wastewater system, was not going to be made available because he was a union employee. While records and documents were being searched and compiled, EPA and FDEP staff initiated the facility site review and operation and maintenance review.

FDEP personnel guided the EPA personnel through the facility site and its wastewater system. The site review began at pond 1, followed by stop at one of the influent pipes where wastewater from the facility's industrial plant is pumped into a ditch connecting pond 6 and pond 1². Storm water runoff is collected and pumped from perimeter collection ditches located throughout the site into Pond 6 and potentially other locations within the wastewater treatment system.

The next observation was of the initial liming station which was located in the ditch connecting pond 6 and pond 1³. The permit describes the wastewater treatment process to have primary liming stage and a secondary treatment with hydrated lime prior to discharge off-site.

The next stops were at pond 6 where EPA and FDEP personnel tried to locate the emergency outfalls 003 and 004. An outfall structure was located on the northeast side of pond 6 that could have been outfall 003⁴. Despite our efforts during the inspection, another outfall was not located that could have been outfall 003 or 004. Coronet's consultants Mr. Douglas Grant and Mr. David Gatchel accompanying the personnel from EPA and FDEP during this inspection did not provide any information regarding these outfalls and Coronet's wastewater system operations. Coronet's personnel responsible for the wastewater system operations, although present on site at the time of inspection, were not made available during this inspection. Hence, EPA and FDEP personnel could not verify with certainty whether the outfall structure found was indeed outfall 003.

The site review followed southward on the east side of pond 6 where the FDEP staff identified the toe drain installed by Coronet based on FDEP's recommendation and identified the permanent pump utilized by Coronet to pump the water from the seepage ditch around pond 6 and surrounding wetlands back into pond 6.

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- ¹ See photographs in attachment 1.
 - ² See photographs in attachment 2.
 - ³ See photographs in attachment 3.
 - ⁴ See photograph in attachment 4.

The site review then shifted northwards to pond 5, #4 ditch, and pond 7. The unauthorized outfall⁵ at pond 7 was confirmed to be in existence, however, no discharge was noted from pond 7 to English Creek at the time. In addition, a riser structure was noted in pond 7 that could discharge into English Creek through #4 ditch. Also, the unauthorized pipe with the permanent valve plate in the seepage ditch (#4 ditch) around pond 5⁶ was confirmed to be in existence, however, no discharge through this pipe was noted at the time. Because the permit does not identify a single permitted outfall at pond 7 for discharge to English Creek and it does not identify a permitted outfall to English Creek from the #4 ditch, the existence of these structures and pipes is an unauthorized deviation from the approved drawings, exhibits, specifications and/or conditions of the permit and constitutes grounds for enforcement action. Any discharges from either of these structures and pipes to English Creek would be considered unpermitted discharges. Lastly, no discharge was noted from permitted outfall 005 located at north-northeast side of pond 5.

Next, the site review proceeded towards pond 3, ponds 2A and 2, pond 8, pond 4, pond 4A, and English Creek. A pipe from pond 8 into a ditch connecting to pond 7 was noted to be plugged with concrete. The interconnection between pond 8 and pond 7 via this pipe was first discovered by FDEP on February 17, 2003. Until this discovery, the water in pond 7 was thought to be storm water only and was so represented by Coronet. FDEP first confirmed the plugging of this pipe with concrete during the March 27, 2003, inspection and was reconfirmed during this inspection.

The secondary liming stage was located between pond 3 and 8 and was not in operation at the time, and appeared to be maintained in poor condition⁷. At the time of inspection, Coronet was conducting research and development using mobile reverse osmosis system at ponds 4 and 4A⁸. There was no discharge to English Creek noted from ponds 4 and 4A through permitted outfall 001.

There were indications that Coronet had dredged some of the ponds and had placed some of the dredged materials on the ground⁹. Pursuant to Part V, Section A, item 2 of the permit, such placement or land application requires prior approval from FDEP, with the exception of performing dam maintenance. Coronet did not make available the personnel with intimate knowledge of wastewater system operations to ascertain whether such placement of dredged material was in compliance with the aforementioned part and section of the NPDES permit.

According to the FDEP personnel present during the inspection, the water levels in most of the ponds during this inspection were considerably lower than during the FDEP inspections in August 2003. This suggests that Coronet may have discharged significant amount of water in accordance with Immediate Final Order (IFO) issued on August 27, 2003, by FDEP to ensure berm integrity. Also, according to FDEP personnel, Coronet had carried out FDEP recommended improvements to some of the berms and had added a toe drain to pond 6 as stated above.

⁵ See photograph in attachment 5.

⁶ See photograph in attachment 6.

⁷ See photograph in attachment 7.

⁸ See photograph in attachment 8.

⁹ See photographs in attachment 9.

The site review then proceeded to English Creek. The site review of the English Creek was conducted from a wood bridge that was considered a sampling point at the end of 800 meter mixing zone for Fluoride and Specific Conductance established by the NPDES permit. The English Creek appeared to be dry¹⁰.

Since Coronet had gathered records which we had requested for review by end of December 9, 2003, EPA personnel decided to review the records on December 10, 2003, and suspended remaining site review until the afternoon of December 11, 2003. On December 11, 2003, EPA personnel discovered that many of the photographs taken on one of the digital camera were not available for viewing due to insufficient data memory, hence, some portion of the site were revisited and additional photographs were taken using additional data memory card, and additional cameras. During the site review conducted on December 11, 2003, we noted that on the southeast side of the facility, Coronet had some raw and/or waste materials on the ground, exposed to the nature's elements, with only a perimeter ditch to collect contaminated storm water¹¹. A BMP plan as prescribed in the permit was not available for review at the time of inspection. The permit indicates that the BMP plan was submitted to FDEP in 1997. The BMP plan implementation is required to minimize the potential for the release of pollutants from ancillary activities, including material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading locations and sludge or waste disposal areas. The extent of implementation of the BMP plan was unclear and not verified.

¹⁰ See photographs in attachment 10.

¹¹ See photographs in attachment 11.

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ATTACHMENT 1.



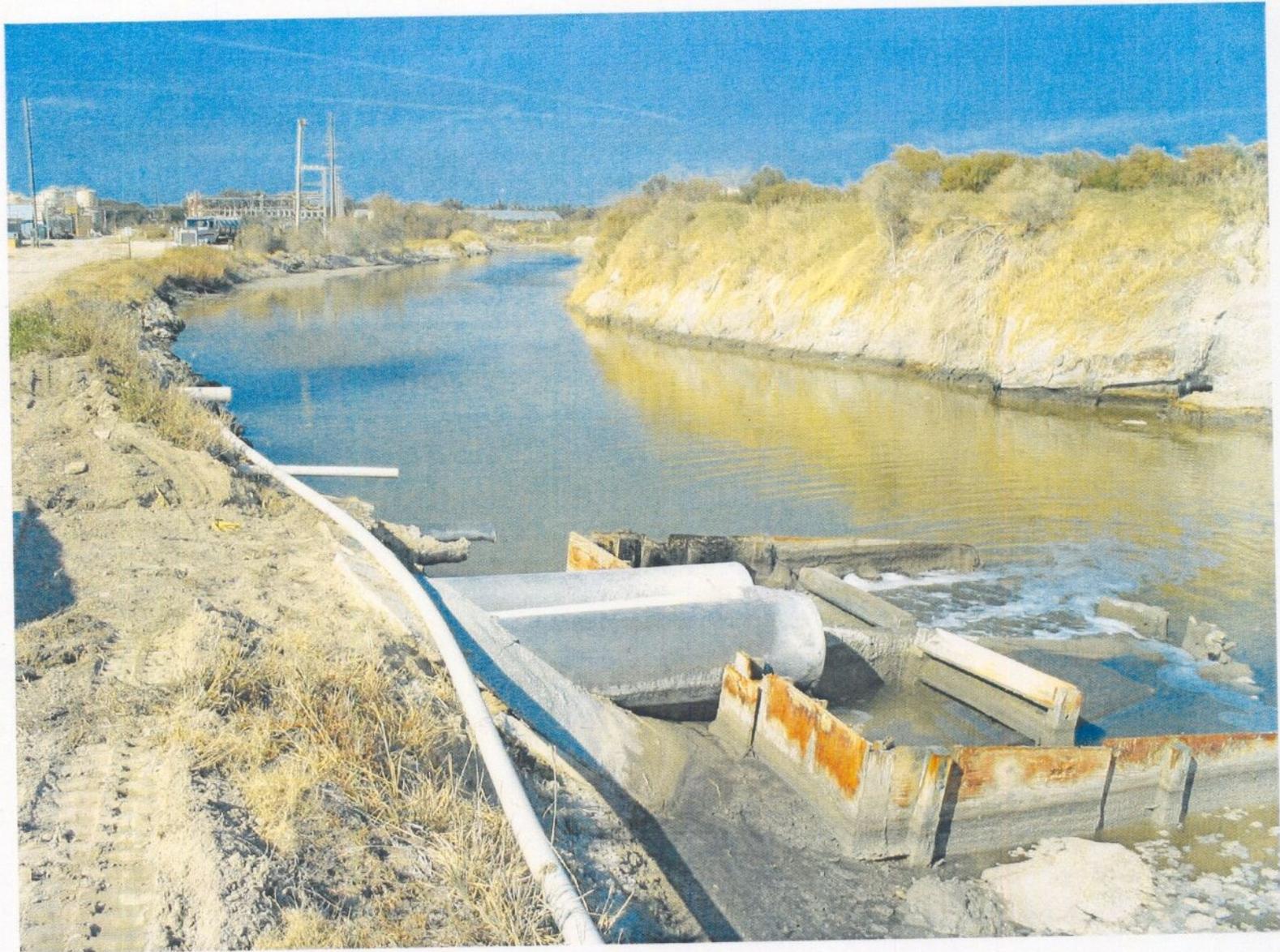
A staff gauge or a device for measuring water level in pond 4A.

ATTACHMENT 1.



A staff gauge or a device for measuring water level in pond 1.

ATTACHMENT 2.



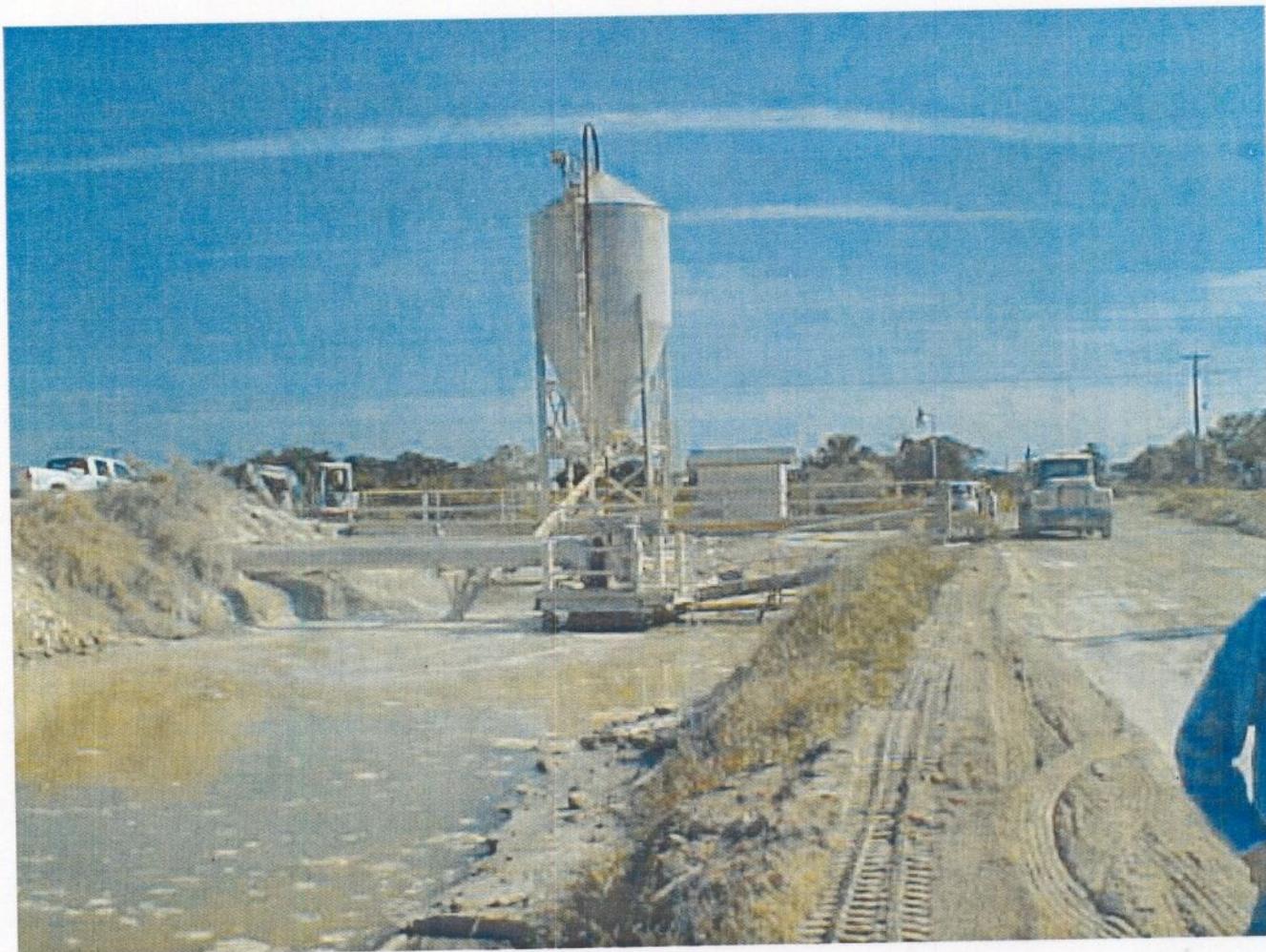
Point of entry for industrial wastewater into the wastewater treatment system.

ATTACHMENT 2.



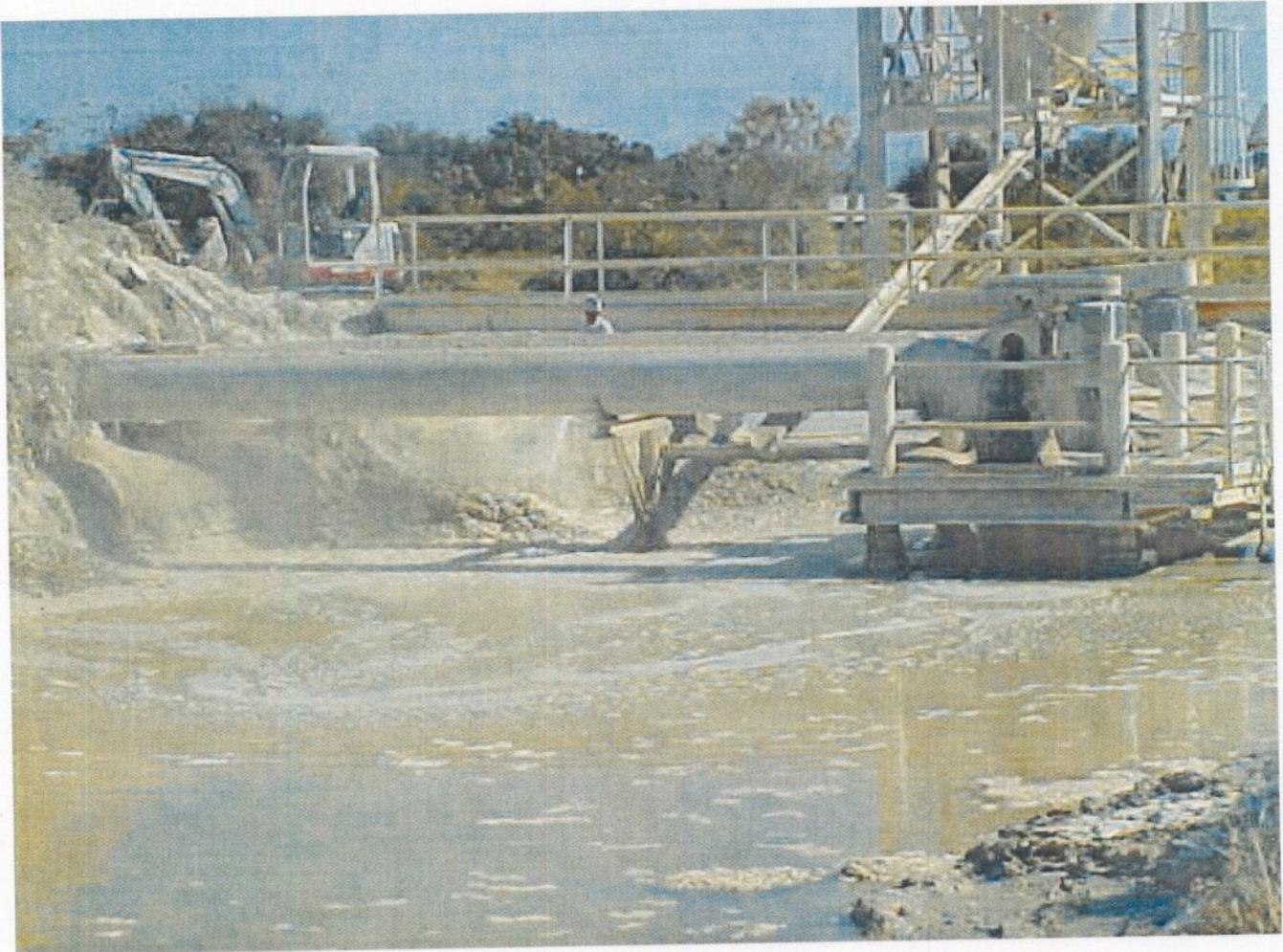
Point of entry for industrial wastewater into the wastewater treatment system.

ATTACHMENT 3.



Initial liming station at a ditch connecting pond 6 and pond 1.

ATTACHMENT 3.



Initial liming station at a ditch connecting pond 6 and pond 1.

ATTACHMENT 4.



Outfall 003 at the northeast side of pond 6?

ATTACHMENT 5.



On the left, the unpermitted outfall structure at pond 7.
On the right the riser structure at pond 7.

ATTACHMENT 6.



On the left is a pipe from the riser structure at pond 7.
On the right is the permanent valve in place over an unpermitted pipe in ditch #4.

ATTACHMENT 7.



Lime Station 2 located between ponds 3 and 8.

ATTACHMENT 8.



Mobile RO unit at pond 4 and/or 4A.

ATTACHMENT 9.



Dredged materials from the pond placed on the ground.

ATTACHMENT 9.



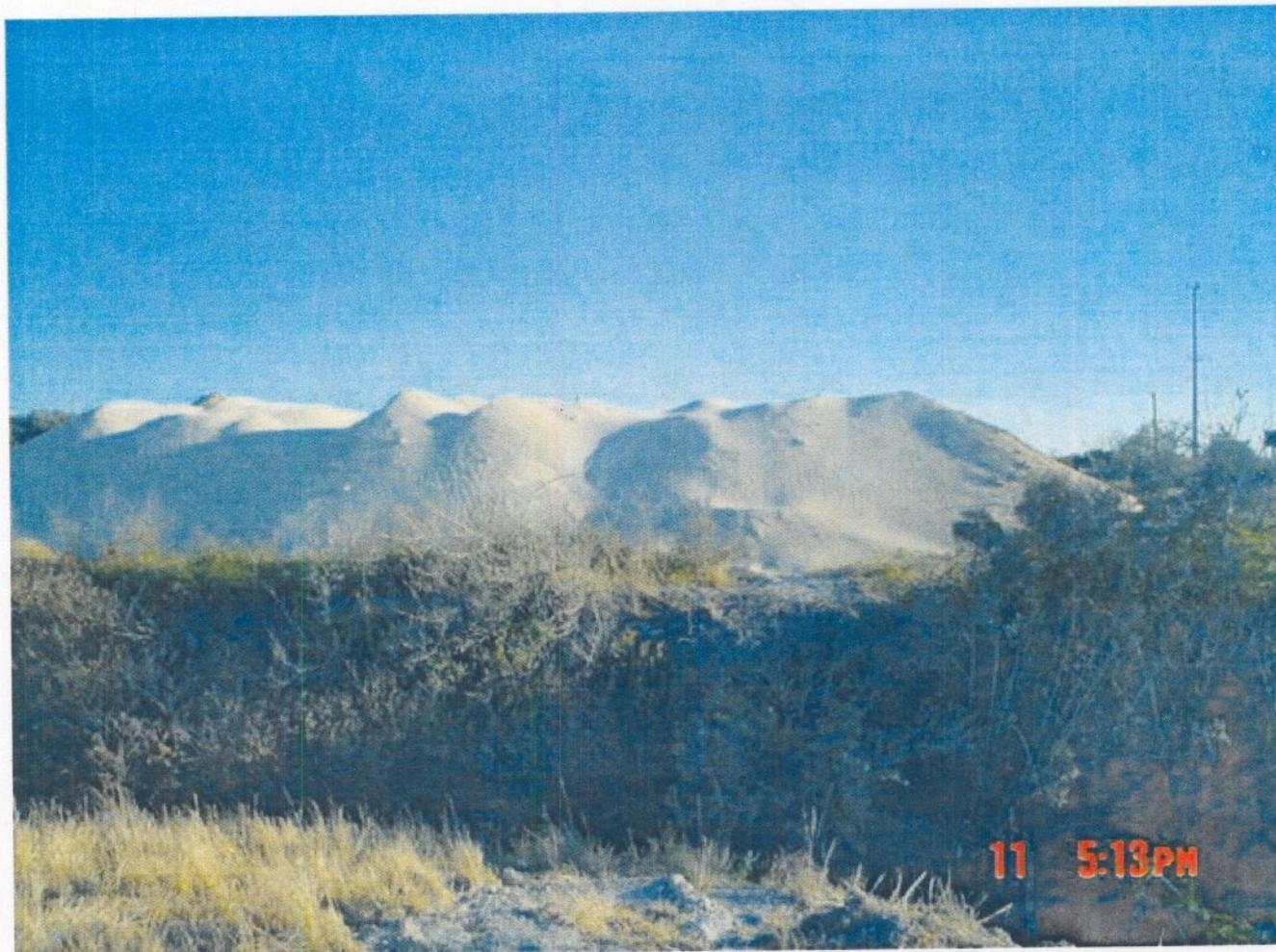
Dredged materials from the pond placed on the ground.

ATTACHMENT 10.



Picture of English Creek from a wood bridge at the end of the mixing zone.

ATTACHMENT 11.



Raw and/or waste material on the ground at south - southeast side of the Coronet facility.



Raw and/or waste material on the ground at south - southeast side of the Coronet facility.

ATTACHMENT 11.



Raw and/or waste material on the ground at south - southeast side of the Coronet facility.

PWS INSPECTION REPORT SUMMARY
U.S. EPA, Region 4

System Name: Coronet Industries, Inc	PWS ID #: FL6290371
Inspection Date: December 9, 2003	Water System Class: Non-transient Non-community
Facility Population: 90	Water Source: Ground Water, Floridan Aquifer
Facility Contacts:	Mr. Scott Davis, Manager, Human Resources Coronet Industries, Inc. P.O. Box 760 Plant City, FL 33564
	Mr. David B. Weinstein, Esq. Bales-Weinstein, Attorneys at Law Courthouse Plaza, 625 East Twiggs Street, Suite 100 Tampa, FL 33602
	Mr. Carl R.L. Brown, P.G., Principal Hydro-Environmental Assoc., Inc. 10014 N. Dale Mabry Hwy., Suite 205 Tampa, FL 33618

Introduction:

Mr. Franklin Baker of the United States Environmental Protection Agency (EPA) and Mr. Ed Watson, Florida Department of Environmental Protection (FDEP) conducted a compliance inspection of the Coronet Industries, Inc. (Coronet) drinking water system on December 8, 2003. The drinking water system is operated by Coronet to provide potable water for the facility. Coronet also operates a separate industrial process water system for the facility. The Coronet facility is located at 4082 Coronet Road, southeast of Plant City, Hillsborough County, Florida.

After presentation at the facility front gate guard station, the inspectors were met by Mr. John Broughton, Environmental Department, Coronet Industries, Inc. A written letter from the U.S. Attorney's office in Tampa, Florida, was presented to Mr. Broughton at 9:20 AM, requesting cooperation for the inspection. Mr. Broughton left the inspectors at the guard station and were subsequently met by Mr. Scott Davis, Manager, Human Resources, at 9:45 AM. The inspectors presented credentials and business cards to Mr. Davis and were escorted to an administration building conference room where a written Safe Drinking Water Act *Notice of Inspection* was presented to Mr. Davis at 10:00 AM. The team discussed the planned inspections with Mr. Davis and Mr. Davis requested that the team wait for an attorney for Coronet to arrive at the facility.

Upon arrival of Mr. David B. Weinstein, independent counsel for Coronet, the team further discussed the planned inspections. Mr. Weinstein explained that the facility is currently involved in litigation and many of the compliance records needed for inspection were in counsel's offices in Tampa, being copied and catalogued. Mr. Weinstein asked the inspectors to make a list of records that would be needed for inspection and the records would be located and brought to the facility.

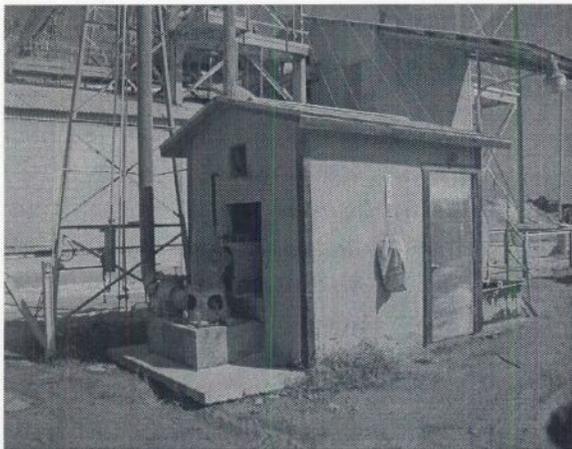
Mr. Baker and Mr. Watson listed for review the drinking water system's bacteriological monitoring plan and monitoring records for the past 24 months, the lead and copper monitoring records for the past 10 years, the volatile organic contaminant monitoring records for the past ten years, the inorganic contaminant monitoring records for the past ten years, the synthetic organic contaminant monitoring records for the past ten years, the radiological contaminant monitoring records for the past ten years, and a copy of the most recent sanitary survey for the water system. These records are required to be maintained and provided for inspection.

Mr. Weinstein and Mr. Davis explained that the facility operates twenty-four hours a day, seven days a week with a total of about 90 employees on three shifts. There are about 60 employees on the day shift. The Safe Drinking Water Information System (SDWIS) national drinking water database of record shows a drinking water system population of 162 for the facility.

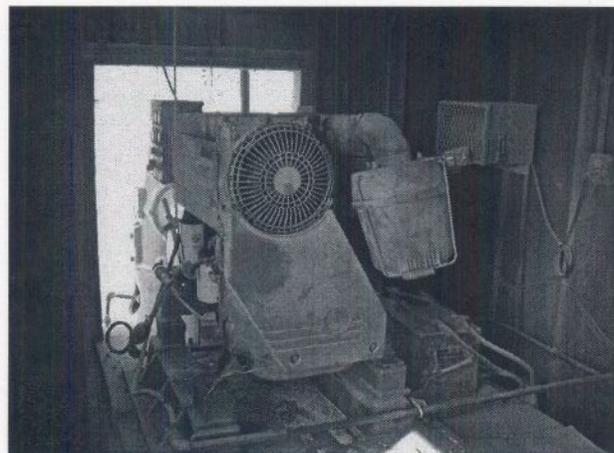
Water System Site Visits

Mr. Carl Brown, Coronet's consulting geologist, escorted Mr. Baker and Mr. Watson to the drinking water system. Mr. Brown was initially unable to locate the drinking water well. Picture 1 and Picture 2 are of one of the industrial process water wells described as well "C4."

After calling the facility office, Mr. Brown located the drinking water well. The potable drinking water well is described as well C2 and is the subject of Picture 3. Potable water well C2 is on the left of the picture. Well C1, an industrial process water well, is visible on the right side of the picture. An underground storage reservoir, Picture 4, is located behind the wells.

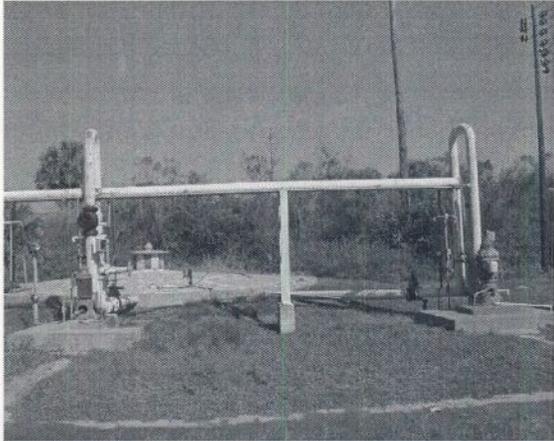


Picture 1

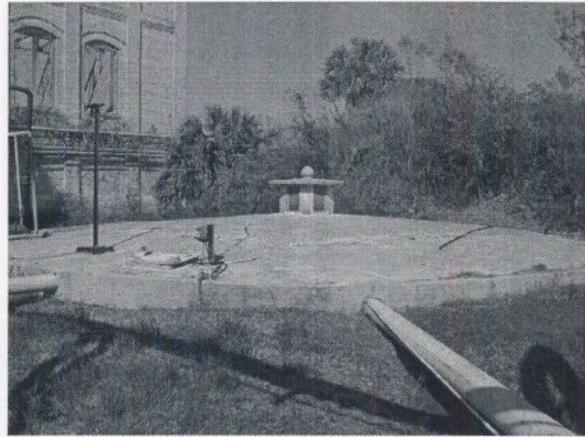


Picture 2

Well C2 is a registered potable well with FDEP tag #AAH5977 on the well head. There is no corresponding FDEP registration tag for well C1. Well C1 and C2 are manifolded together connecting C1 to the potable water system. With the opening of a valve, water of uncertain quality from unregistered well C1 could be introduced into the potable water system. The valve appeared to be closed at the time of the inspection. The C2 well pump cycled on several times while the inspectors observed the well. Well C1 was not observed operating during the inspection. The inspection team was joined by Mr. John Broughton, Coronet's drinking water system licensed operator to explain details of the construction and operation of the water system.



Picture 3

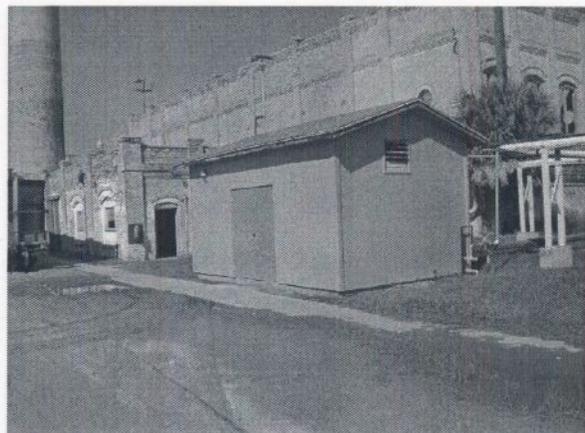


Picture 4

The underground storage reservoir is used to store industrial process water. The potable water well C2 is manifolded to the reservoir along with the industrial process water well C1. The reservoir was historically part of the drinking water system but is no longer part of the potable water system design. The reservoir had an unsecured hatch and was full of water. No ripples or waves were observed in the tank while the pump was running for well C2.



Picture 5



Picture 6

Picture 5 shows well C2 along with the water treatment shed. Picture 6 is another view of the water treatment shed where the water from well C2 is treated prior to introduction into the distribution system. While well C2 was pumping, a pressure meter was observed on the water line just prior to entering the water treatment shed which showed the well pump producing 40 pounds per square inch. The water treatment shed interior appears to be well maintained, well-lit and well organized. The treatment process in the treatment shed includes two oxidizing greensand filters in series to reduce iron levels; water is then pumped to a mixing and aeration tank for disinfection with sodium hypochlorite. The potable water is then pumped to four bladder tanks prior to introduction to the distribution system. A residual chlorine sample was taken and analyzed by Ed Watson, FDEP, in the treatment shed at a sample point prior to the distribution system. The sample showed 0.36 ppm residual chlorine. The inspection team then proceeded to the breakroom in the administration building to sample residual chlorine levels in the distribution system. John Broughton, Coronet, sampled and analyzed a breakroom tap water sample and found 0.80 ppm residual chlorine using a Hach Pocket Colorimeter. Ed Watson, sampled the tap water in the breakroom and found 1.69 ppm residual chlorine. The inspection team then broke for lunch at about 2:00 pm.

Monitoring Records Review

Following the break, the inspectors returned to the administration building conference room. At about 4:30 PM, Mr. Weinstein provided bacteriological monitoring records for the previous 24 months for review. The inspectors reviewed the bacteriological sample siting plan dated October 13, 1999. The plan provides for monthly sampling with two samples from various locations in the distribution system and 1 raw water sample. The siting plan specifies six specific sample locations and two alternative locations and a rotation schedule with certain sites sampled in certain months. The bacteriological analysis results were reviewed and the inspectors found that the samples were taken in accordance with the monitoring plan schedule, with no variations from the plan. The results for November 2003 reported a positive result for coliform from the raw water sample for well C2. No positive results from the distribution system monitoring, indicating the presence of bacteria, were reported. Bacteriological monitoring results for October 2003 were not provided at the time of the inspection. The bacteriological monitoring results for 2001 and 2002 were also provided with no positive coliform results reported. Prior to June 2002, raw water samples for both C1 and C2 wells were taken and reported, indicating that well C1, as well as C2, was used as a drinking water well. Beginning in June 2002, only well C2 is sampled for bacteriological monitoring, indicating that C1 is no longer used as a water supply well. These results show no bacteriological monitoring results above the regulatory maximum contaminant level (MCL).

An asbestos monitoring sampling and analysis report dated May 30, 2002, was provided with reported results below the analytical detection limits.

Bacteriological monitoring results for October 2003 and the remaining chemical monitoring results were requested but not provided for inspection. Mr. Weinstein agreed to locate and submit the records by mail to EPA within two weeks from December 9, 2003, the day of the inspection. The drinking water program inspectors then departed the facility at about 5:30 pm.

On December 23, 2003, EPA received correspondence from Mr. David Weinstein dated December 22, 2003, submitted on behalf of Coronet which included bacteriological and chemical monitoring records requested during the inspection.

The bacteriological monitoring record for October 2003 was provided with the correspondence. The results reported a positive result for coliform from the raw water sample for well C2 and no positive coliform results from the distribution system. These results show no bacteriological contamination above the MCL.

Copies of lead and copper records for the last ten years were requested and provided with the correspondence. The facility completed its initial round of lead and copper monitoring in 1993 but failed to complete a satisfactory second round of six-month monitoring for January - June 1994, as Hillsborough County Public Health Unit found that the facility failed to use a certified laboratory for the analysis. Starting over, the facility took 10 samples for its initial six-month round of lead and copper monitoring on October 18, 1994. The 90th percentile level for lead was 0.002 mg/l, and for copper, 0.12 mg/l. The facility took its second round of 10 samples on March 13, 1995. The 90th percentile level for lead was 0.004 mg/l. The 90th percentile level for copper was 0.88 mg/l. The facility requested approval for annual monitoring with the number of sampling sites reduced to 5 which the Hillsborough County Public Health Unit approved on April 7, 1995. The facility sampled for lead and copper on August 19, 1996, and the 90th percentile level for lead was 0.009 mg/l, and for copper, 0.09 mg/l. The facility sampled for lead and copper on July 15, 1997, and the 90th percentile level for lead was 0.006 mg/l, and for copper, 1.23 mg/l. The facility requested approval for reduced monitoring every three years which the Hillsborough County Public Health Unit approved on April 7, 1995, requiring the facility to begin its triennial lead and copper monitoring in 1998 to coincide with the standard monitoring framework. The facility sampled for lead and copper on August 24, 1998, and the 90th percentile level for lead was 0.003 mg/l, and for copper, 1.16 mg/l. The facility sampled for lead and copper on July 3, 2001, and the 90th percentile level for lead was 0.004 mg/l, and for copper, 0.253 mg/l. These results show no lead and copper contamination above the regulatory action levels.

Copies of volatile organic contaminant (VOC) monitoring records for the last 10 years were requested and provided with the correspondence. The records document a sample taken August 3, 1994, and analyzed for cis-1,2-dichloroethylene. The analytical result reported is "<1" with a minimum detection limit (MDL) of 1 ug/l or 0.001 mg/l. The MDL required by 40 CFR 141.24 is 0.0005 mg/l. The report notes that it is a "recheck of MCL." suggesting a prior detection of the analyte. No prior related report or further explanation was provided.

A copy of a full VOC analysis laboratory report cover page was provided for samples taken on March 14, 1995, from C1 well, currently an industrial process water well not used for drinking water. No analytical results were included with the submission.

A copy of a full VOC analysis laboratory report was provided for samples taken on August 9, 1995, from a location described as "water treatment plant exit." The analytical results reported for each analyte is "<0.5" with an MDL of 0.5 ug/l or 0.0005 mg/l.

A copy of a full VOC analysis laboratory report was provided for samples taken on June 18, 1997, from a location described as "C-1 Deep Well 4082 Coronet Road." The analytical results reported for each analyte is less than the MDL with an MDL of less than or equal to 0.5 ug/l or 0.0005 mg/l.

A copy of a full VOC analysis laboratory report was provided for samples taken on June 1, 1998, from a location described as the distribution entry point. The analytical results reported for each analyte is "BDL" or below detection limit, with an MDL less than or equal to 0.07 ug/l or 0.00007 mg/l.

A copy of a full VOC analysis laboratory report was provided for samples taken on April 11, 2001, from a location described as the distribution entry point. The analytical results reported for each analyte is "not detected" with an MDL of 0.5 ug/l or 0.0005 mg/l.

Copies of inorganic chemical (IOC) monitoring records for the last 10 years were requested and provided with the correspondence.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on September 12, 1994, from a location described as "treatment plant." The analytical results reported for nitrate "<1.0" mg/l and for nitrite "<0.01" mg/l.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on March 14, 1995, from a location described as "C-1 well." The analytical results reported for nitrate "<1.0" mg/l and for nitrite "<0.01" mg/l.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on August 9, 1995, from a location described as "water treatment plant exit." The analytical results reported for nitrate "<1.0" mg/l and for nitrite "<0.01" mg/l.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on June 18, 1997, from a location described as "C-1 Deep Well 4082 Coronet Road." The analytical results reported for nitrate "<1.0" mg/l and for nitrite "<0.01" mg/l.

A copy of a full IOC analysis laboratory report was provided for samples taken on June 1, 1998, from a location described as the distribution entry point. The analytical results reported for fluoride was 0.44 mg/l, nitrate at 0.22 mg/l, and sodium at 33.1 mg/l. The results for the remaining analytes are "BDL" or below detection limit.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on March 22, 1999, from the distribution entry point. The analytical results reported for nitrate "0.28" mg/l and for nitrite "BDL" or below the detection limit.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on March 8, 2000, from the distribution entry point. The analytical results reported for nitrate "0.08" mg/l and for nitrite "<0.01" mg/l.

<=0.1489 mg/l and for nitrite <=0.1489 mg/l.

A copy of a nitrate and nitrite analysis laboratory report was provided for a sample taken on November 20, 2001, from a location described as "P.O.E" or the distribution point of entry. The analytical result reported for nitrate is "0.088" mg/l.

A copy of a full IOC analysis laboratory report was provided for samples taken on April 4, 2001, from a location described as the distribution entry point. The analytical results reported for barium was 0.014 mg/l, chromium 0.0004 mg/l, fluoride was 0.602 mg/l, lead was 0.003 mg/l, nickel was 0.004 mg/l, nitrate at 0.20 mg/l, and sodium at 0.033 mg/l. The results for the remaining analytes are "not detected".

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on March 14, 2002, from locations described as "Well 1" and "Well 2". The analytical results reported for nitrate are "not detected" for Well 1 and "not detected" for Well 2. The nitrite results reported are "not detected" for Well 1 and "not detected" for Well 2.

A copy of the asbestos monitoring sampling and analysis report was provided for samples taken on May 30, 2002, with reported results below detection limits, with an MDL of 0.08 MFL.

A copy of a nitrate and nitrite IOC analysis laboratory report was provided for samples taken on May 7, 2003, from the distribution entry point. The analytical results reported for nitrate is "not detected". The nitrite result is reported at "0.009" mg/l.

Copies of synthetic organic chemical (SOC) monitoring records for the last 10 years were requested and provided with the correspondence.

A copy of a Florida Department of Health and Rehabilitative Services- Hillsborough County Public Health Unit correspondence dated February 17, 1995, was provided. The correspondence referred to pesticide monitoring that Coronet performed between January 1, 1990 and December 31, 1993, and approving "grandfathering" of this monitoring for the initial 1993-1995 monitoring period.

A copy of a full SOC analysis laboratory report was provided for samples taken on June 1, 1998, from a location described as the distribution entry point. The reported analytical results for each analyte were "BDL" or below the detection limit, and the report states that dioxin was "not tested" for. The detection limits accomplished for endrin, simazine, hexachlorocyclopentadiene, carbofuran, alachlor, 2,4-D, benzo(a)pyrene, pentachlorophenol were above the minimum specified analytical MDLs required by the federal regulations.

A copy of Florida Department of Health and Rehabilitative Services- Hillsborough County Public Health Unit correspondence providing a Waiver for pesticide and PCB monitoring for the 1999-2001 compliance period, dated April 11, 2001, was submitted.

A copy of a turbidity analysis laboratory report was provided for a sample taken on June 1, 1998, from a location described as the distribution entry point which was reported at 5.3 ntu.

A copy of a gross alpha radionuclide analysis laboratory report was provided for a sample taken on March 14, 1995, from an unspecified location. The result is reported as 9.1 pCi/l with an analysis error of +/- 1.7 pCi/l.

A copy of a gross alpha radionuclide analysis laboratory report was provided for a sample taken on June 1, 1998, from a location described as the distribution entry point which was reported as 2.0 +/- 3.0 pCi/l.

These results show no VOC, SOC, IOC, or radiological chemical contamination above the MCLs.

A copy of the most recent sanitary survey, performed by the Florida Department of Health and Rehabilitative Services-Hillsborough County Public Health Unit on November 13, 2002, was provided. No concerns or violations are noted in the sanitary survey.

Conclusions and Recommendations

Well(s)

The facility has historically used wells C1 and C2 for potable water supply. Only well C2 is currently authorized by Florida and being monitored and maintained as a potable water well. Wells C1 and C2 are manifolded together presenting a cross-connection with the potable well. An in-ground reservoir is connected to wells C1 and C2 and was historically used as part of the potable water system. The reservoir is currently only used for the industrial process water system and does not appear to be maintained to the standards of a potable water tank.

Protection of the drinking water system from contamination due to cross-connection with well C1 and back-flow from the reservoir appears inadequate. Coronet should consider modifications to the manifold system, disconnecting well C1, well C2, and the reservoir to preclude the potential for contamination of the potable water system from well C1 and the reservoir.

Treatment & Distribution System

The facility has a well maintained, well-lit, and organized water treatment shed.

Monitoring and Records

The facility had complete records of contaminant monitoring, demonstrating sampling and analysis performed in the proper frequencies. The monitoring records show that some analyses have been conducted with inadequate method detection limits. The facility should ensure that its laboratory perform analyses in accordance with 40 C.F.R. §141.24 to avoid having any analytical results invalidated and being required to go on a quarterly monitoring schedule.

J. J. Baker

12-20-04

Peer Reviewed by:

Date:

A

12/20/04

Supervisor Reviewed by:

Anthony J. Collins

12/21/04