



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 14, 2007

Re: Lawrence County
Honeywell International, Inc.
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Joe Davis, Project Manager
OMI, Inc. - Ironton Site
3329 South Third Street
Ironton, Ohio 45638

Dear Mr. Davis:

On May 31, 2007, a Compliance Evaluation Inspection (CEI) was conducted at the Honeywell Ironton Facility. The purpose of the inspection was to determine Honeywell's compliance with its NPDES Permit. Present for the inspection were Joe Davis and Pat Holmes representing OMI, Honeywell's contractor, and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

As a result of my inspection, I have the following comments:

1. Flow to the wastewater treatment plant is down due to iron fouling of the wells and lack of precipitation in the area. Honeywell has been trying to re-develop some of the wells and has also cleaned some of wells to help increase flow.
2. Outfall 001 was observed at the sampling location. The discharge appeared to be clean. The equipment in this area showed rust staining.
3. The former production area, wastewater treatment systems and the groundwater wells for the coke plant remediation were observed as part of the inspection. Due to the lack of precipitation, the lower save-all had heavier oil sheen than normal. The discharge from the lower save-all will be treated in the wastewater treatment system that includes an oil/water separator so the heavier oil sheen should not cause a problem with the discharge.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the

environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "*Facility Pollution Prevention Guide*" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

In conclusion, Honeywell appeared to be in compliance with its NPDES Permit at the time of the inspection.

No response to this letter is requested. If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosure

c: Charles Geadelmann, P.E., Honeywell International, Inc.

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIF00014*KD	OH000754	May 31, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Honeywell International, Inc. 3330 South Third Street Ironton, Ohio 45638	10:45 a.m.	August 1, 2002
	Exit Time	Permit Expiration Date
	12:00 p.m.	July 31, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Joe Davis, Site Manager	(740) 532-9486
Name, Address and Title of Responsible Official	Phone Number
Charles O. Geadelmann, P.E., Manager, Remediation & Evaluation Services Honeywell International, Inc. 1985 Douglas Drive North Golden Valley, MN 55422	(763) 954-5418

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N/A</u> Sludge Storage/Disposal	<u>--</u> Other
<u>N/A</u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

6/14/07

Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

6/14/07

Date