



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

September 18, 2008

Re: Lawrence County
Dow Chemical
Compliance Evaluation
Inspection (CEI)
Correspondence (IWW)

Mr. Troy DeHoff, Site Leader
Dow Chemical Company
925 County Road 1A
Ironton, Ohio 45638

Dear Mr. DeHoff:

On September 4, 2008, a Compliance Evaluation Inspection (CEI) was conducted at Dow Chemical's Hanging Rock facility. The purpose of the inspection was to determine Dow's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were: Joe Amos, John Hill and Mike Ratliff representing Dow; and Richard Stewart and Stephen Wells representing Ohio EPA, Southeast District Office. Wastewater samples were not collected as part of the inspection. A copy of the inspection report is attached.

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

1. Dow is planning on eliminating Ethafoam production in the near future. Please inform this office in writing once the Ethafoam process is completely eliminated.
2. Ohio EPA has received Dow's NPDES Permit renewal application and is in the process of renewing the NPDES Permit. Since Dow submitted the NPDES Permit renewal application 180 days prior to expiration date, Dow can continue discharging under the expired NPDES Permit until a renewal is issued. A date when a draft renewal will be issued is not known at this time.
3. The wastewater treatment plant was observed. The plant appeared to be operating properly and in good condition.

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, Dow Chemical Company appeared to be in compliance with its NPDES Permit at the time of the inspection. No further response is requested at this time.

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: John Hill, Dow Chemical Company

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-------------------|-----------------|-----------|---------------|
| 01F00004*FD | OH0099309 | September 4, 2008 | C | S | 2 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Dow Chemical Company Hanging Rock Plant 925 County Road 1A Ironton, Ohio 45638 | 10:00 a.m. | December 1, 2003 |
| | Exit Time | Permit Expiration Date |
| | 12:30 p.m. | July 31, 2008 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| John Hill, Regulatory Affairs Leader | (740) 533-4035 |
| Joe Amos, Regulatory Affairs Leader | (304) 747-3623 |
| Name, Address and Title of Responsible Official | Phone Number |
| Troy DeHoff, Site Leader Dow Chemical 925 County Road 1A Ironton, Ohio 45638 | (740) 533-4000 |

C. AREAS EVALUATED DURING INSPECTION

| | | |
|-----------------------------------|------------------------------------|----------------------------------|
| <u>S</u> Permit | <u>S</u> Flow Measurement | -- Pretreatment |
| <u>S</u> Records/Reports | <u>S</u> Laboratory | -- 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>S</u> Sludge Storage/Disposal | -- Other |
| -- 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

9/23/08
Date


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

9/23/08
Date

E. PERMIT VERIFICATION

| Inspection Observations Verify the Permit | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| a. Correct name and mailing address of permittee | X | | | |
| b. Correct name and location of receiving waters | X | | | |
| c. Product(s) and production rates conform with permit application (industries) | | | X | |
| d. Flows and loadings conform with NPDES permit | X | | | |
| e. Treatment processes are as described in permit application/briefing memo | X | | | |
| f. New treatment process(es) added since last inspection | | X | | |
| g. Notification given to state of new, different, or increased discharges | X | | | |
| h. All discharges are permitted | X | | | |
| i. Number and location of discharge points are as described in permit | X | | | |

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

| | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| a. Any significant violations since the last inspection | X | | | |
| b. Permittee is taking actions to resolve violations | X | | | |
| c. Permittee has compliance schedule | | X | | |
| d. Compliance schedule contained in: _____ | | | X | |
| e. Permittee is meeting compliance schedule | | | X | |

Comments:

G. OPERATION AND MAINTENANCE

| Treatment Facility Properly Operated and Maintained | Yes | No | N/A | N/E |
|--|-----|----|-----|-----|
| a. Standby power available: Generator <u>X</u> Dual Feed <u>X</u> | X | | | |
| b. Adequate alarm system available for power or equipment failures | X | | | |
| c. All treatment units in service other than backup units | X | | | |
| d. Sufficient operating staff provided: # of shifts <u>2 (12)</u> Days/Week <u>7</u> | | | | |
| e. Operator holds unexpired license of class required by permit Class: _____ | | | X | |
| f. Routine and preventive maintenance schedule/performed on time | X | | | |
| g. Any major equipment breakdown since last inspection | | X | | |
| h. Operation and maintenance manual provided and maintained | X | | | |
| i. Any plant bypasses since last inspection | | X | | |
| j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number | | | X | |
| k. Any hydraulic and/or organic overloads experienced since last inspection | | X | | |

Comments:

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X _____ N/A

| | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| b. Sludge Management Plan current | | | X | |
| c. Sludge adequately disposed (Method: <u>Landfilling</u>) | X | | | |
| d. If sludge is incinerated, where is ash disposed of? _____ | | X | | |
| e. Is sludge disposal contracted (Name: <u>Green Valley Landfill</u>) | X | | | |
| f. Has amount of sludge generated changed significantly since last inspection | | X | | |
| g. Adequate sludge storage provided at plant | X | | | |
| h. Land application sites monitored and inspected per SMP | | | X | |
| i. Records kept in accordance with state and federal law | X | | | |
| j. Any complaints received in last year regarding sludge | | X | | |
| k. Is sludge adequately processed (digestion, dewatering, pathogen control) | X | | | |

Comments:

I. SELF-MONITORING PROGRAM

| Part 1 - Flow Measurement | Yes | No | N/A | N/E |
|--|-----|----|-----|-----|
| a. Primary flow measuring device properly operated & maintained. Type of device: _____ ultrasonic & parshall flume _____ calculated from influent _____ X _____ weir _____ Other _____ ultrasonic & weir _____ X Specify: <u>See below*</u> | X | | | |
| b. Calibration frequency adequate (date of last calibration: <u>Aug. 12, 2008</u>) | X | | | |
| c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained | X | | | |
| d. Flow measurement equipment adequate to handle expected ranges of flows | X | | | |
| e. Actual flow discharged is measured | X | | | |
| f. Flow measuring equipment inspection frequency: _____ X _____ Daily _____ Weekly _____ Monthly _____ Other | | | | |

Comments: *Outfall 001 - V-Notch weir
 Outfall 601 - Magmeter

| | | | | | |
|----|--|--|---|--|--|
| a. | Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories | | X | | |
| b. | Do you notice staining or discoloration of soils, pavement, or floors | | X | | |
| c. | Do you notice distressed (unhealthy, discolored, dead) vegetation | | X | | |
| d. | Do you see unidentified dark smoke or dustclouds coming from sources | | X | | |
| e. | Do you notice any unusual odors or strong chemical smells | | X | | |
| f. | Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities | | X | | |

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments: