



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

June 9, 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 May 7, 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: Gail Bradley 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. The facility has been split into two different companies; Americans Styrenics and Dow. Americans Styrenics has taken over the operation of the Styron magnum line. Dow will still be responsible for meeting the requirements of the NPDES Permit for the entire facility. Americans Styrenics and Dow have worked out an agreement for the discharge of Americans Stryenics wastewater through Dow's NPDES Permit.
2. Plant staff needs to continue sampling and testing the liquid styrene tank dike water for contaminants before discharging. Staff must continue to record test and discharge times, test performed and results.
3. 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.

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 to this letter.

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

Enclosures

c: Gail Bradley, Regulatory Affairs Leader (w/enclosures)

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01F00004*FD	OH0099309	May 7, 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	10:15 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)
Gail Bradley, Regulatory Affairs Leader	(740) 533-4035
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		

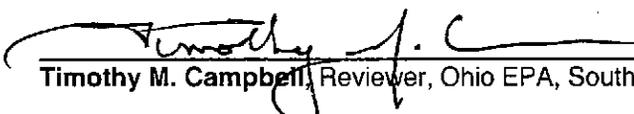
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.

  
\_\_\_\_\_  
Stephen Wells, Inspector, Ohio EPA, Southeast District Office

6/9/08  
\_\_\_\_\_  
Date

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

6/9/08  
\_\_\_\_\_  
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: _____				
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:

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 0%				
b. Any collection system overflows since last inspection (CSO ____ SSO ____ )				
c. Regulatory agency notified of overflow (SSOs)				
d. CSO O and M plan provided and implemented				
e. CSOs monitored and reported in accordance with permit				
f. Portable pumps used to relieve system				
g. Lift station alarm systems provided and maintained				
h. Are lift stations equipped with permanent standby power or equivalent				
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
j. Any complaints received since last inspection of basement flooding				
k. Are any portions of the sewer system at or near capacity				

Comments:

## H. SLUDGE MANAGEMENT

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

	Yes	No	N/A	N/
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: Landfilling)	X			
d. If sludge is incinerated, where is ash disposed of? _____		X		
e. Is sludge disposal contracted (Name: Green Valley Landfill)	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:



Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/
f.	Quality assurance manual provided and maintained				X
g.	Satisfactory calibration and maintenance of instruments and equipment				X
h.	Adequate records maintained				X
i. Results of latest U.S. EPA quality assurance performance sampling program:					
Date: _____ *		<input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Marginal <input type="checkbox"/> Unsatisfactory			

Comments: \*DMRQA-24

#### J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	None
601	None	None	None	None	None	None	None

Comments:

#### K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
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: