

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 23, 2011

Re: Lawrence County
South Point Biomass Generation, LLC
Inspection
Correspondence (IWW)

Mr. Mark Harris, CEO
South Point Biomass Generation, LLC
65 Avenue of Champions
Nicholasville, KY 40356

Dear Mr. Harris:

On April 29, 2011, an inspection was conducted at the South Point Biomass Generation Facility. No one was present at the site during the inspection. Also, no activity was noted at the site during the inspection. The fuel storage area has had vegetation growth to cover the area. Also, the walls of the fuel storage area have some erosion take place.

Please contact this office when work is started on the installation of the rest of the wastewater treatment systems at the facility.

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

ODP0003820070207

ODP0003820070207

LIEBERT CORPORATION

2007/02/07



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

February 7, 2007

Re: Pretreatment
Liebert Corporation
Compliance Inspection
City of Ironton

Mr. Darrin Callicoaat.
Facilities/Environmental Manager
Liebert Corporation
3040 South Ninth Street
Ironton, Ohio 45638

Dear Mr. Callicoaat:

On January 19, 2007, I inspected Liebert Corporation's Ironton facility. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You, Emmett Kiritsky, and Andy Koeswanto, represented Liebert Corporation during the inspection.

General Facility Description:

Liebert manufactures temperature control systems for electronics, computers, and communications equipment applications. Manufacturing operations include copper tube brazing, assembly of panels, compressors, cooling fans, cooling coils, water and helium leak testing, freon charging, wiring, and final packaging. All coils are leak tested after brazing using compressed air to pressurize the coils while immersed in a water tank.

Some panels are powder coated prior to assembly. A 6 stage iron phosphating system is used to prepare the metal panels for coating. The stages include: 1) alkaline cleaning; 2) deionized water rinse; 3) reverse osmosis (RO) spray rinse; 4) phosphating; 5) deionized water rinse; and 6) RO spray rinse. RO concentrates are returned to the cleaning stage and phosphating stage respectively. An Abanaki oil skimmer is used to remove oils from the cleaning stage. Deionized water is used as makeup water in all stages except the final rinses. When the cleaning and phosphating waste waters become contaminated with excess solids, they are disposed off site. Deionizer units are regenerated off site by US Filter.

Process waste waters are generated from the 6 stage iron phosphating system, the 1300 gallon leak testing tank, 20 gallon brazing quench tanks located next to brazing work areas (roughly 10 tanks), and floor cleanup. Only leak testing water is currently discharged to the sewer. All other wastewaters are hauled to United Wastewater Services for treatment. Average daily flows to the sewer are estimated at 300 gallons. Waste waters are subject to the Metal Finishing Point Source Categorical Standards, 40 CFR 433.17.

Liebert reported the following exceedances of IDP limits between July 2005 and June 2006. Please note that comparison with monthly average limitations is performed based on the arithmetic mean of all data points collected during a calendar month.

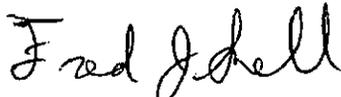
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01042	Copper, Total (Cu)	30D Conc	2070	2380	5/1/2006

Comments:

Liebert is considering elimination of the leak testing wastewater by replacing the current system with another utilizing pressurized nitrogen gas. If this change is made, there would be no remaining sources of process wastewater discharged to the sewer. Liebert would then have the option of retaining the IDP in the event the company wishes to discharge to the sewer in the future, or requesting that Ohio EPA revoke the IDP. Once the IDP is revoked, discharge of any process water to the sewer would be unlawful. Please notify Ohio EPA if and when Liebert decides to eliminate the leak testing discharge.

You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/mlm

Enclosure

- c: John Haskins, Superintendent, Ironton WWTP
- c: Pretreatment Unit, DSW, CO

PRETREATMENT Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00038*AP	OH0025852	January 19, 2007	P	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Liebert Corporation 3040 South Ninth Street Ironton, Ohio 45638	12:15 pm	December 1, 2002
	Exit Time	Permit Expiration Date
	1:30 pm	November 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Darrin Callicoat, Facilities/Environmental Manager Andy Koeswanto, Facilities/Lean Manager	(740) 547-5125 (740) 547-5131
Name, Address and Title of Responsible Official	Phone Number
Jerry Ross, Plant Manager	(740) 547-5132

C. AREAS EVALUATED DURING INSPECTION

S = Satisfactory
M = Marginal
U = Unsatisfactory
N = Not Evaluated

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

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

See attached letter.

Fred J. Snell

Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

2/6/07

Date

Timothy M. Campbell

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

2/6/07

Date

ODP0000620070207

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ENVIROTANK CLEAN INC

2007/02/07



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-6501 FAX: (740) 385-6490
www.epa.state.oh.us

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

February 7, 2007

**RE: PRETREATMENT
COMPLIANCE INSPECTION
ENVIROTANK CLEAN, INC.
CITY OF BELPRE**

Mr. Ray Lutes, Vice President
EnviroTank Clean, Inc.
Route 1, PO Box 372
Belpre, Ohio 45714

Dear Mr. Lutes:

On December 28, 2006, I inspected EnviroTank Clean in Belpre. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and B.S. Saluja represented EnviroTank Clean during the inspection. ETC appeared to be in substantial compliance with its IDP at the time of the inspection.

General Facility Description

EnviroTank Clean performs tank truck cleaning and treats wastewaters and sludges from various off-site customers. Wastestreams may include landfill leachate, purge water from monitoring wells, recovered product spills, contaminated soils, oil water separators, machining lubricants, and underground storage tank cleaning.

The wastewater treatment system includes storage in one of five holding tanks, equalization, emulsion breaking, oil removal, metals precipitation, neutralization, primary clarification, dissolved air floatation, two stage activated sludge treatment, secondary clarification, and sand filtration. An aerated sludge holding tank is used for sludge digestion followed by a belt filter press for dewatering.

Sludge handling facilities include 4 drying beds for dewatering. EnviroTank also has a sloped mixing area for solidifying oily liquids and sludges.

Daily flows averaged approximately 35,000 gallons during the past year. EnviroTank's discharge is regulated by the Centralized Waste Treatment Point Source Category 40 CFR 437.46 Subpart D.

EnviroTank reported the following exceedances of its IDP limits between January 2005 and December 2006.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01077	Silver, Total (Ag)	30D Conc	35.1	76	3/1/2005
001	01097	Antimony, Total	1D Conc	237	251	3/28/2005
001	01097	Antimony, Total	30D Conc	141	251	3/1/2005
001	01097	Antimony, Total	1D Conc	237	407	4/18/2005
001	01097	Antimony, Total	30D Conc	141	407	4/1/2005
001	99983	Zinc, Total	30D Conc	641	846	7/1/2005

Recommended Actions:

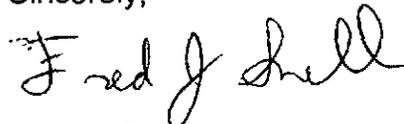
The concrete in the area of the emulsion breaking tanks showed evidence of deterioration from acid etching caused by the emulsion breaking process. It is recommended that a protective coating be installed to prevent further damage to the concrete and to prevent any release of wastewaters to the soils underlying the concrete.

A stairway or secure ladder is recommended to enable operators to safely and conveniently inspect the lamella clarifier.

The grates that cover the in ground activated sludge tanks have corroded. Some portions of the grates would not prevent a person from falling through into the aeration tanks. EnviroTank should consider replacing the grates or adding rails to reduce the risk of accidental drowning.

You may contact me at (740) 380-5423 office with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/mlm

c: Bill Harpold, City of Belpre
Mike Betz, City of Belpre
Pretreatment Unit, DSW, CO

PRETREATMENT Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00006*CP	OHP000049	December 28, 2006	P	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
EnviroTank Clean, Inc. Route 1, PO Box 372 Belpre, Ohio 45714	10:00 am	July 1, 2002
	Exit Time	Permit Expiration Date
	11:30 am	June 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Ray Lutes, Vice President Steve Grady, Operator	(740) 423-0907
Name, Address and Title of Responsible Official	Phone Number
B.S. Saluja, P.E., President	(304) 755-8448

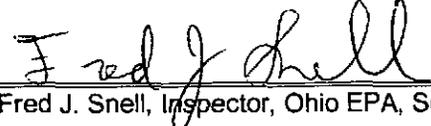
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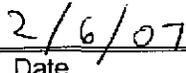
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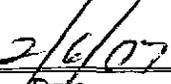
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 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office


 Date


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


 Date