



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Henry County  
Tenneco Inc.  
Pretreatment

April 22, 2009

Mr. Gary Myers, Facility Engineer  
Tenneco Inc.  
11800 State Route 424  
Napoleon, Ohio 43545

Dear Mr. Myers:

On March 9, 2009, an inspection was conducted at Tenneco Inc., in Napoleon. Dana Martin Hayden and Ryan Geirhart represented the Ohio EPA. You, Betty Mowery, and Allison Jeffers, were present and provided operation and maintenance information, regarding industrial wastewater pretreatment discharges to the Village of Napoleon sanitary sewer system. Our inspection included a tour of the facility and completion of the enclosed inspection form.

During our visit, all treatment units were in operation. There was a strong organic smell at the treatment plant which was thought to be from an increased loading of phosphates into the system. The final effluent was not observed but the effluent that flows to the final discharge tank from the clarifier was observed and appeared clear.

Since our last inspection on November 15, 2007, there have been two limit violations for zinc. Both occurred in December 2007.

It was noted that the sampling refrigerator did not have a thermometer in it. A thermometer is needed in the unit to ensure that it is holding samples at the proper temperature. In addition, do not store food items in the sample refrigerator.

During our inspection we observed that a tank has been added to the treatment system by the sludge holding tank. The purpose of this tank is to dispose of spent acid and soap from the industrial process. The spent fluids are only introduced into the tank on an intermittent basis with the tank being kept empty most of the time. The liquid from the tank is fed into the sludge prior to being sent to the filter press. The sludge has not been sampled after the spent acid and soap has been added.

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The sludge needs to be sampled after the spent fluids are added to ensure that the landfill requirements are still attained. You are in violation of Ohio Administration Code 3745-42-02(A)(1)(a), which requires that a PTI approval is received prior to installation of a new disposal system or modification of an existing system.

We inspected the bioremediation ponds at the facility. A heavy amount of rain occurred the night before the inspection and it was observed that the water level gage showed less than one (1) foot of freeboard. As stated in the PTI for the bioremediation ponds, once the freeboard is less than one (1) foot, the water will have to be pumped to the City of Napoleon POTW, until the water level drops below 1.5 feet. During the inspection it was noted that the northern pond (labeled pond #5) was not hydrological connected to the other ponds. There was a pipe observed between pond #2 and pond #5, but the pipe was well above the water level and no water was flowing between the two ponds.

Since the goal of this remediation system is to have enough water in the ponds to allow bioremediation, it may be advantageous to leave the pipe connecting pond #2 and #5 at the current elevation. To document this change and review its impact, submit as-built drawings to our office and a letter from your engineer. We would like the engineer to evaluate if this change in pipe elevation justifies the need to put another depth gauge in pond #5. The inspection logs for the ponds were reviewed during the inspection. It was noted on some of the reports that only pond #3 data was reported. Data for every pond should be included on the inspection form.

During our inspection, we discussed the bioremediation pond PTI and the sampling required under this PTI. From review of your files, we noted that on September 1, 2007, your consulting firm ENSAFE, sent us a comprehensive letter evaluating how the required pond sampling results compared to the PTI long term bioremediation goals. From review of the inspection logs it is apparent that the water level in the ponds was allowed to be higher for a good part of the last year. If the bioremediation pond sample results remain in line with the PTI goals the water level goals may be adjusted. At the conclusion of the sampling event schedule for this year, submit a sampling result summary for the bioremediation ponds and address the effect the higher water levels may have had on the ponds.

The facility has several personnel covering the environmental concerns at the site. Due to this arrangement it seems that there is a lack of coordination on various environmental issues.

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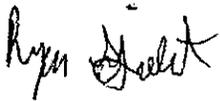
The following issues need additional administration coordination and oversight with respect to environmental rules and regulations: incomplete bioremediation pond inspection reports, unclear contact for pond PTI issues, lack of familiarization with bioremediation pond PTI requirements and sampling goals, issues related to optimal bioremediation treatment, impacts that the plant phosphate line maintenance and operations practices have on the WWTP, and new process added without a PTI submittal. The success of the WWTP and the bioremediation ponds is only possible with clear operations and maintenance oversight.

During our inspection we observed that the Udylite Tank #2 (Alkaline Cleaner EC3828), in the west phosphate chemical treatment line, had a brown sticky sludge collecting on the Udylite tank. Investigate the cause and impact of this substance leaching into the drainage system, which discharges to the process wastewater treatment system.

A storm water management plan (SWMP) was not observed at the facility. A compliance schedule will be placed in your Indirect Discharge permit to complete a SWMP. The SWMP should address the issue of storage of old equipment outside of your facility.

Our completed inspection report is enclosed for your records. If you have any questions, please call me at (419) 373-3053 or Dana Martin Hayden at (419) 373-3067.

Sincerely,



Ryan Gierhart  
Division of Surface Water



Dana Martin-Hayden  
Division of Surface Water

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pc: DSW-NWDO File