



**Environmental
Protection Agency**

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

June 1, 2011

Re: Pretreatment
FeeCorp Industrial Services
IU Inspection
City of Ironton
Permit No. ODP00047*AP

Mr. Dave Kelly
FeeCorp Industrial Services
1120 Wyanoke Street
Ironton, Ohio 45638

Dear Mr. Kelly:

On May 13, 2011, I inspected FeeCorp Industrial Services. The inspection was conducted to review the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Clyde Potter, Dispatcher, represented FeeCorp during the inspection.

General Facility Description:

FeeCorp performs industrial cleaning services, including pressure washing and vacuum truck services. Materials are managed at the customer's site and are not brought back to the Ironton facility. The facility is used as the business' headquarters and for equipment maintenance and storage. FeeCorp proposed to clean tank truck interiors in 2004 when the facility was purchased. However, the tank cleaning business did not materialize. The tanker wash bay is now being used for equipment storage. An oil/water separator was installed to serve the tanker wash bay but it was not connected to the building drains. The only wastewater generated at the facility is from occasional exterior vehicle wash in the maintenance building. Floor trenches with sumps are provided to remove grit from the wash water prior to discharge to the sewer.

FeeCorp has an expired Ohio EPA Indirect Discharge Permit.

Required Actions:

1. Part III of FeeCorp's Indirect Discharge Permit ODP00047*AP requires FeeCorp to submit effluent monitoring reports in June and December of each year. Ohio EPA records do not show reports for the January through June 2010 or July through December 2010 reporting periods. FeeCorp is in violation of the Indirect Discharge Permit and Rule 3745-3-06(E) of the Ohio Administrative Code. The

effluent monitoring reports must be submitted regardless of whether there is a discharge during the applicable reporting period. Please submit the referenced reports to Ohio EPA within 30 days.

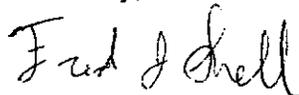
2. FeeCorp's Indirect Discharge Permit ODP00047*AP expired on December 31, 2010. Ohio EPA sent a renewal notice to FeeCorp on March 2, 2010. However, Ohio EPA has not received a renewal application as of this date. Please notify Ohio EPA of FeeCorp's intention to either apply for renewal of the IDP or request revocation of the IDP. If FeeCorp wishes to retain its authorization to discharge to the Ironton sewer under the IDP, FeeCorp should submit an application for renewal of the permit as soon as practical. You may download the application from the Ohio EPA website: <http://www.epa.ohio.gov/dsw/pretreatment/forms.aspx>.

Comments:

You indicated during the inspection that FeeCorp does not expect to operate as a tanker wash facility. If there are no discharges of process waste water anticipated in the future, there would be no apparent benefit to maintaining FeeCorp's IDP. As long as the IDP remains effective, FeeCorp is required to submit monitoring reports and pay permit fees. If FeeCorp does not wish to maintain its IDP, please request in writing that Ohio EPA revoke the IDP.

Please respond to this letter, in writing, within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

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
ODP00047*AP	OHP000202	May 13, 2011	3	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
FeeCorp Industrial Services 1120 Wyanoke Street Ironton, Ohio 45638	12:30 pm	January 1, 2006
	Exit Time	Permit Expiration Date
	1:30 pm	December 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Clyde Potter, Dispatcher Dave Kelly, Operations Manager	(740) 533-1445
Name, Address and Title of Responsible Official	Phone Number
George Fee, President	(614) 348-8080

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached letter.

6/1/11

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

6/1/11

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