



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

November 13, 2008

**Re:** Coshocton County  
Coshocton Ethanol Company, LLC  
Self-Monitoring Report Violations  
OEPA Permit No. 01N00260\*AD  
NPDES Permit No. OH0135330  
Correspondence (IWW)

Mr. Ben Wilton, Director of Safety, Health, Env., Quality & Security  
Coshocton Ethanol Company, LLC  
209 South 19th Street  
Suite 475  
Omaha, NE 68102

Dear Mr. Wilton:

We have received and reviewed your self-monitoring reports from May through September 2008 for the referenced facility. Our review indicates that this facility is currently in noncompliance. Specific instances of noncompliance and/or deficiencies are as follows:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00515	Residue, Total Dissolved	1D Conc	1500	1528.	5/28/2008
001	00400	pH	1D Conc	9.0	9.09	6/4/2008
004	00400	pH	1D Conc	6.5	6.47	6/4/2008
005	00400	pH	1D Conc	6.5	5.84	6/4/2008
007	00400	pH	1D Conc	6.5	6.46	6/4/2008
001	00400	pH	1D Conc	9.0	9.48	6/11/2008
001	00400	pH	1D Conc	9.0	9.32	6/18/2008
001	00400	pH	1D Conc	9.0	9.67	6/25/2008
001	00011	Water Temperature	30D Conc	82	84.92	7/1/2008
001	00400	pH	1D Conc	9.0	9.34	7/2/2008
001	00011	Water Temperature	1D Conc	85	86.	7/2/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1770.	7/2/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1618.	7/13/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1858.	7/16/2008
001	00011	Water Temperature	1D Conc	85	86.	7/23/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1793.	7/23/2008
001	00011	Water Temperature	1D Conc	85	86.	7/30/2008
001	00011	Water Temperature	30D Conc	82	82.4	8/1/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1732.	8/7/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1742.	8/8/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1702.	8/13/2008
004	00400	pH	1D Conc	6.5	6.38	8/28/2008
005	00400	pH	1D Conc	6.5	5.2	8/28/2008
001	00515	Residue, Total Dissolved	1D Conc	1500	1584.	9/17/2008

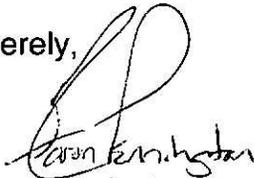
Please be advised that failure to comply with the effluent limitations or to satisfy reporting requirements of your NPDES permit can be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. This facility has had reported limit violations every month since February 2008.

Recent e-mail correspondence from October 23, 2008 suggested that there was some confusion in reading the limit and monitoring tables in the permit. Whereas, the loading limit number was perceived as the concentration limit number. Additionally, Tom Taylor had corresponded to us that temperature reporting was subject to a high potential of operator error. Coshocton Ethanol's facility may want to consider creating an operations plan/manual to ensure that sufficient blowdowns are maintained and sampling procedures are adequate. In addition, you may want to consider having the ability to adjust for pH.

Please inform this office, in writing, within fourteen days of receipt of this notification as to the status of the implemented corrective actions being taking to meet compliance.

If there are any questions, please contact me at (740) 380-5272.

Sincerely,



Aaron Pennington  
Environmental Specialist  
Division of Surface Water

AP/dh

c: Tom Taylor, EHS Manager, Coshocton Ethanol Company, LLC