



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

October 25, 2007

**Re: Coshocton County
Organic Technologies
Compliance Evaluation Inspection
Correspondence (IWW)**

Mr. Mark Westbrook, Safety & Env. Coord.
Organic Technologies
1245 S. Sixth Street
Coshocton, Ohio 43812

Dear Mr. Westbrook:

On October 9, 2007, Ohio EPA conducted a Compliance Evaluation Inspection at the Organic Technologies plant in Coshocton. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0IN00122*DD and evaluate the wastewater treatment systems performance. Overall the plant appeared to be operating in compliance.

The following list summarizes violations which have been reported through Monthly Operating Reports (MORs) since the effective date of the current permit (September 1, 2003) including current reported data:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2004	001	00400	pH	1D Conc	6.5	6.18	3/5/2004
May 2004	001	00400	pH	1D Conc	6.5	6.47	5/7/2004
June 2004	001	00400	pH	1D Conc	6.5	6.13	6/11/2004
June 2004	001	00400	pH	1D Conc	6.5	6.1	6/28/2004

We have on file a letter submitted to our agency dated January 19, 2005 discussing 3 of the above four reported violations.

There is a pipe exiting the South end of the facility along Clow Lane which appears to discharge into a storm water culvert. During the inspection, it was mentioned that the pipe is believed to be associated with floor drains from the fabrication shop. The agency recommends that the pipe source be investigated. If indeed it is a floor drain, the pipe should be routed to sanitary and/or floor drain eliminated.

During the inspection, storage of drums and totes were noticed to the Southwest portion of the facility. Secondary containment for the storage area was not present. The area is without roof and much of the ground is a layer of coarse gravel. Drainage from storm events and potential spills appears to drain towards storm water catch basins in route to the Muskingum River. There is a concern with the handling/storage in this area. We request that the Organic Technologies propose a remedy to provide secondary containment for this area.

A copy of our inspection report is enclosed. The assistance and cooperation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AP/dh

Enclosure

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IN00122*DD	OH0050067	October 9, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Organic Technologies 1245 S. Sixth Street Coshocton, OH 43812	10:15 a.m.	September 1, 2003
	Exit Time	Permit Expiration Date
	1:30 p.m.	August 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
John Williams – DHS&S	(740) 622-0755
Mark Westbrook – Safety & Env. Coord.	(740) 622-3231 fax
Name, Address and Title of Responsible Official	Phone Number
David Wiley, President & CEO	

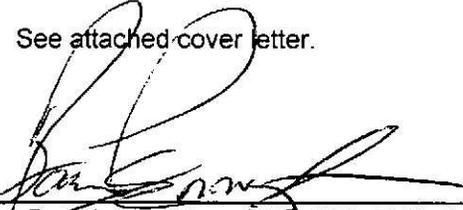
C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached cover letter.



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

10-25-07

Date



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

10/25/07

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 ¹			

Comments: ¹ A pipe is in route to a storm culvert that appeared to be connected to floor drains from the fabrication shop near the South end of the plant.

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:			X	
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:				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: ___ Days/Week: ___			X	
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			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:

Comments:

Part 3, Laboratory - General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b.	If alternate analytical procedures are used, proper approval has been obtained				X
c.	Analyses being performed more frequently than required by permit				X
d.	If (c) is yes, are results reported in permittee's self-monitoring report				X
e.	Commercial laboratory used				
	1. Parameters analyzed by commercial lab:		X		
	2. Lab name:				

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained				X
g.	Satisfactory calibration and maintenance of instruments and equipment	X			
h.	Adequate records maintained				X

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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