



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

December 20, 2007

**Re:** Jackson County  
OSCO Industries, Inc.  
NCCW General Permit  
Notice of Revocation

Mr. Keith Denny, Plant Manager  
OSCO Industries, Inc.  
P.O. Box 327  
Jackson, Ohio 45640

Dear Mr. Denny:

On December 6, 2007, Tim Campbell and I of the Ohio EPA Division of Surface Water performed a reconnaissance inspection of the OSCO Jackson Plant. The purpose of the inspection was to gather information on the cooling water process and the appropriateness of coverage of your facility under the General Non-Contact Cooling Water (NCCW) Permit.

Based on our field review of your facility we have determined that you do not qualify for coverage under the general NCCW permit for the following reasons:

1. The recycled cooling water is considered cooling water blowdown when it is discharged from the cooling system during a power outage.
2. OSCO uses a highly toxic additive for the recycled cooling water, which, when the system blows down during a power outage, could harm aquatic life.

Since you are not eligible for coverage under the general permit, any discharge that you have from this system is unauthorized. OSCO must take the appropriate steps to eliminate the discharge or get it properly permitted.

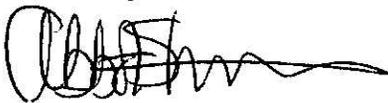
Ohio EPA believes OSCO should consider these options to address the cooling water issue.

- a. OSCO could provide a backup generator for the recycling pumps so that it would not be necessary to switch to once through city water for cooling during a power outage. If the system is completely recycled, a discharge permit would not be needed.

- b. OSCO could switch to a once through cooling water system. Coverage under the general NCCW permit would be allowed. Sampling would be required once a month. A sampling point prior to co-mingling with stormwater or any other flow would be needed.
- c. OSCO could separate the recycled cooling water system from the once through emergency cooling water so that the recycled flow is automatically separated and contained for re-use when the system returns to normal. Coverage would be provided under the NCCW general permit and OSCO would be required to sample when the cooling water is discharging. A sampling point prior to co-mingling with stormwater or any other flow would be needed.
- d. OSCO could explore the option of discharging to the city sanitary sewers. You should contact Joan Waugh, Pretreatment Coordinator at the City of Jackson, for more information, at (740) 286-1137.

There may be other options available. If you would like to meet to discuss these issues, we would be amenable. If you have any questions, please contact me at your convenience.

Sincerely,



Ms. Abbot Stevenson  
Environmental Engineer  
Permits and Enforcement Section  
Division of Surface Water

AS/dh

- c: Joan Waugh, Pretreatment Coordinator, City of Jackson Wastewater Treatment Plant
- c: Ryan Burke, OSCO Industries, Inc.