



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

November 4, 2008

Re: Washington County
Little Hocking Service Center
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Jeff D'Costa
DuPont Little Hocking Service Center
251 Arrowhead Road
P.O. Box 452
Little Hocking, Ohio 45742

Dear Mr. D'Costa:

On October 14, 2008, a Compliance Evaluation Inspection (CEI) was conducted at DuPont's Little Hocking Service Center. The purpose of the inspection was to determine DuPont's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Jeff D'Costa and Dave Deem representing DuPont and Joann Montgomery and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

As a result of my inspection, I have the following comments:

1. DuPont has reported NPDES Permit effluent limitation violations for Total Residual Oxidants for the months of July, August and September, 2008 at Outfall 001. Effluent limitation violations have also been reported for Total Residual Chlorine for September, 2008 at Outfall 602.
2. In response to the above violations, DuPont in its investigation of the cause, has determined that the wrong Standard Method may have been used in analyzing the samples. For Total Residual Chlorine, the Standard Method is 4500-CL and the EPA Method is 330.5. DuPont should ensure its lab or contract lab is following one of these methods.
3. The location of the grab sample for Outfall 001 was discussed. If DuPont would need to collect the sample further down the discharge ditch, Ohio EPA has no problem with this approach as long as the sample is collected before the discharge mixes with the receiving stream. DuPont would need to inform this office of the change in the sampling location in writing.

4. The sand filters of the package plant had some vegetation growth. The sand filters need to be cleaned as soon as possible. Please inform this office when the sand filters have been cleaned.
5. Ohio EPA has received DuPont's response to the Notice of Violation (NOV) dated September 18, 2008. No further response is requested.

In conclusion, DuPont Little Hocking Service Center appeared to be in marginal compliance with its NPDES Permit at the time of the inspection, due to the NPDES Permit effluent limitation violations.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Please respond to above comments in writing to this office within 15 days of receipt of the letter.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IQ00023*ED	OH0094641	October 14, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
DuPont Little Hocking Service Center 251 Arrowhead Road Little Hocking, Ohio 45742	1:00 p.m.	April 1, 2005
	Exit Time	Permit Expiration Date
	2:15 p.m.	March 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jeff D'Costa, Unit Manager	(740) 989-1248
Name, Address and Title of Responsible Official	Phone Number
Jeff D'Costa, Unit Manager DuPont Little Hocking Service Center 251 Arrowhead Road, P.O. Box 452 Little Hocking, Ohio 45742	(740) 989-1248

C. AREAS EVALUATED DURING INSPECTION

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

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

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

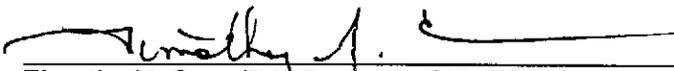
See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

11/4/08

Date



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

11/4/08

Date