



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 25, 2012

Re: Perry County
CESCO Plant
Industrial Stormwater
0GR00185

Mr. Jeff Maransky
CERCO LLC
416 Maple Avenue
Crooksville, Ohio 43731

Dear Mr. Maransky:

On June 6, 2012, I conducted an inspection of your facility. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. As a result of the inspection, I have the following comments:

PART IV.D. 3. of the permit states that each facility covered by this permit shall develop a description of storm water management controls appropriate for the facility, and implement such controls. The appropriateness and priorities of controls in a SWP3 shall reflect identified potential sources of pollutants at the facility. The description of storm water management controls shall address the following minimum components, including a schedule for implementing such controls:

- a. Good Housekeeping - Good housekeeping requires the maintenance of a clean, orderly facility.
- b. Preventive Maintenance - A preventive maintenance program shall involve inspection and maintenance of storm water management devices (e.g., cleaning oil/water separators, catch basins), as well as inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters, and ensuring appropriate maintenance of such equipment and systems.
- c. Spill Prevention and Response Procedures - Describe your procedures for preventing and responding to spills and leaks.
 - Preventive measures include barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling.

- Response procedures must include notification of appropriate facility personnel, emergency agencies, and regulatory agencies, and procedures for stopping, containing and cleaning up spills. Measures for cleaning up hazardous material spills or leaks must be consistent with applicable Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR part 264 and 40 CFR Part 265. Employees who may cause, detect or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available.

Overall housekeeping is poor around the outside of the facility. Clean all of these areas and ensure that the oil laden sling bags are removed immediately.

Assess the filter press area and ensure that all discharges from this process are routed to sewers and not outside to any ditch or stream.

If you have any questions, please contact me at (740) 380-5277.

Sincerely,



Aaron Wolfe
Storm Water Coordinator
Division of Surface Water

AW/dh