



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 26, 2012

Re: Muskingum County
P&D Transportation, Inc./Federal Express
Industrial Stormwater
OGR00412

Mr. Pat Hennessey
Putnam LLC
P.O. Box 2909
Zanesville, Ohio 43702

Dear Mr. Hennessey:

On May 23, 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 comment:

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 facility. Clean up all oil leaks and spills then ensure that oils are contained in appropriate storage devices in the future.

Within fourteen (14) days of receipt of this letter, submit to me at this office a written notification as to actions taken or proposed to eliminate violations. Your response must include the dates, either actual or proposed, for the completion of the actions. Be advised that the violations at your site subject you to significant monetary penalties that can be assessed daily as provided by ORC 6111.09.

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

Sincerely,



Aaron Wolfe
Storm Water Coordinator
Division of Surface Water

AW/dh