



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 16, 2012

Ms. Kathy Schulz
Rohm and Haas Company
10 South Electric Street
West Alexandria, Ohio 45381

**RE: Rohm and Haas Chemicals LLC, West Alexandria, Storm Water Compliance
Evaluation Inspection and Industrial User Inspection, 2012**

Dear Ms. Schulz:

On July 20, 2012, I conducted the annual industrial user (IU) inspection and storm water compliance evaluation inspection (CEI) at the Rohm and Haas Chemicals LLC West Alexandria location. Willard Vaughan, Brian Purdy, and Lisa Fulcomer represented the facility. The facility is a significant industrial user (SIU) because the transport water used in the polyester process is contact wastewater. If the scrubber water is discharged, then it is also a categorical wastewater. This operation is regulated under the Organic Chemical, Plastics and Synthetic Fibers (OCPSF) Categorical Standard, 40 CFR 414. The inspection covered the polyester manufacturing area, the bromide scrubber, the sampling locations, and storm water discharges.

The facility is in compliance with its indirect discharge permit. The facility has received its permit to install (PTI) for the scrubber and neutralization system, but it hasn't been installed yet. There is a concern that the discharge would not be in compliance with its permit limits. The existing PTI has expired and cannot be extended. If the facility does choose to discharge to the sanitary sewer, a new PTI must be submitted. The renewal of the indirect discharge permit has been completed. The second outfall for the scrubber water has been included. The facility will receive an overall rating of satisfactory.

Brief Description of Facility

Rohm and Haas manufacture high molecular weight polyesters. These pellets are used as the adhesives for frozen dinners to bond the plastic film to the container. The regulated wastewater from the facility is generated from this process. The process consists of mixing organic acids and ethylene glycol at high temperatures and low pressure. The chemicals react to form low molecular weight polyester. If the reaction is not complete, then the mixture will not pelletize. After the low molecular weight polyester is formed, it is then reacted under high temperature and extremely low pressure to form the high molecular weight polyester. The high molecular weight polyester is then extruded and cut into pellets in a transport water to the crystallization tank. This transport (contact cooling) water is the regulated source from the facility. The polyester resin then stays in the crystallization tank

until all of the reactions are complete. The finished pellets are then packaged and shipped off site. In the past, the pellets were transferred into fiber drums after the crystallization tank to go the dryer. This has changed. There is now a metal tank that they are collected in. An auger was also installed to automatically transfer the pellets. The wastewater discharge was not affected by this modification. The facility is only packaging pellets in cardboard boxes.

The facility may discharge the scrubber water to the sanitary sewer. It is unclear if the discharge would meet the facility's permit limits. The facility received its PTI for pH adjustment. This waste stream is regulated under the OCPSF categorical standard. The facility has a separate sampling location for this process. To date, there is no discharge to the sanitary sewer of this discharge. The pH neutralization system has not yet been installed. If the facility does decide to discharge to the sanitary sewer, then they will reapply for the PTI.

Regulated Flows and Pretreatment

Currently, the only source of regulated wastewater is generated from the transport water for the polyester pellets. The water from the crystallization tank overflows into two tanks underneath of it. The tanks are not large enough to contain all of the water and the pellets, so it overflows into the sanitary sewer. The wastewater goes through an in-line strainer to prevent pellets from discharging into the sewer and clogging the flow meter. The flow is also measured at this point. There is a sample tap from this line where the discharge samples are collected. The flows are about the same as last year.

Sampling

The facility is sampling as required in its indirect discharge permit. There were no violations during the past year. The facility must note what preservative is being used when "Other" is noted on the chain-of-custody forms. There has been no discharge from the scrubber. The facility is noting "AL" for no discharge for its self-monitoring report. The on-site pH meter has a three point calibration done, and the % slope is recorded at the Quality Control Laboratory.

The self-monitoring reports must be sent to the village of West Alexandria. This is done to ensure the Village is informed of what is being discharged. This is required in Parts II.2 and Part III.G of the facility's indirect discharge permit.

Storm Water

The facility has received coverage under the multi-sector general industrial storm water permit. Compliance with this permit was also evaluated as part of this inspection. Rohm and Haas Chemicals LLC is covered under Subsector C5 of the new permit. There is no benchmark monitoring required for this subsector.

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The facility had a copy of its storm water pollution prevention plan (SWP3). The SWP3 was in the process of being revised to reflect the staffing changes and name changes at the facility.

A site walk-through was conducted for the storm water discharges. Although it was not raining at the time of the inspection, there was no evidence of contaminated storm water being discharged. The outside storage tanks are diked. The loading/unloading areas also go to secondary containment. These are all valved shut, and are inspected prior to discharge. The containment areas are assigned to be cleaned on a monthly basis. A daily inspection is done of the diked areas.

There was a steam pressure relief valve on the back of the research/laboratory building from a boiler. There was iron staining underneath the valve from the dripping steam. This staining should be cleaned to prevent any problems in the future.

There was a trickle of flow in the storm sewer on the day of the inspection. It had rained earlier. There were no sheens, color or turbidity noted in the storm sewer.

REQUIRED ACTION

Rohm and Haas Chemicals LLC must note what preservative is being used when noting "OTHER" on the chain-of-custody form. This must begin immediately.

The assistance provided by your staff is appreciated. If you have any additional questions, feel free to contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

MP/tf

Enclosures

cc: Willard Vaughan, Rohm and Haas
Brian Purdy, Rohm and Haas
Chris Day, West Alexandria
Ryan Laake, DSW/CO



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00038*DP	OHP000134	07/20/2012	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rohm and Haas Company 10 South Electric Street West Alexandria, Ohio 45381	11:00 am	12/01/2011
	Exit Time	Permit Expiration Date
	1:00 pm	11/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Willard Vaughan, EHS Specialist Brian Purday, EHS Technician Lisa Fulcomer, Operations Leader	513.733.2231	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Village of West Alexandria WWTP	40 CFR 414 Subpart I	

Section C: Areas Evaluated During Inspection	
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)	
S	Pretreatment

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached report.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date 8/15/2012	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date 8/16/2012

Industrial Storm Water Compliance Evaluation Inspection;

Name of facility; **Rohm and Haas Chemicals LLC**

Address; **10 Electric Street, West Alexandria, Ohio 45381**

Permit number; **1GR01215*DG**

Applicable permit sector; **C5**

Date of visit; **7/20/2012**

Time started; **11:40 am**

Time ended; **12:20 pm**

Facility representative(s); **Willard Vaughan, Brian Purdy**

OEPA inspector ; **Mari Piekutowski**

SWP3;

A. Did the facility representative produce an SWP3? **Y /~~N~~ /~~Not requested~~**

A1. Did it include a site map? **Y /~~N~~**

A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y /~~N~~**

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y /~~N~~**

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **Y /~~N~~**

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?
~~Y~~ /~~N~~ / NA

Comments; **The plan is in the process of being revised to reflect changes at the facility.**

Inspection records:

B. Were inspection records available? **Y/~~N~~**

Comments:

Site Observations;

C. Are materials stored exposed to weather? ~~Y~~ **N**. If Yes, list materials.

Raw materials are stored in tank farms. The tank farms are diked. In the truck loading area, there is a trench drain that goes to secondary containment.

D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens .

The secondary containment areas are valved. Any water collected in these areas is inspected before being discharged to the storm sewer. These areas are assigned to be cleaned on a monthly basis. There is a daily inspection of the diked areas.

E. No. outfalls from site/no. inspected 1 / 1 _

There was a trickle of flow in the storm sewer, but did not see any color, sheens, or excessive solids.

G. Did any show evidence of pollutants discharged in the storm water? ~~Y~~ **N**

If yes, describe;

There was an area underneath a steam pressure release valve with iron staining. The facility should look at removing the staining as part of their normal storm water inspection.

H. Other observations/comments;

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Rohm & Haas West Alexandria Facility*

Date of inspection: *July 20, 2012*

OH Number: *OHP000134*

IDP Number: *1DP00038*DP*

Facility Representative: *Willard Vaughan, Brian Purdy, Lisa Fulcomer*

Inspector(s): *Mari Piekutowski*

COMPLIANCE

1. Date of last pretreatment inspection: *July 21, 2011*

2. Has the facility been in compliance with its permit limits since the last inspection? Y / N
If no, explain:

3. Is the facility in compliance with all other requirements?
Sampling procedures Y / N / NA
Reporting (late reporting, failure to report, etc) Y / N / NA
Compliance schedules Y / N / NA
Submitted BMR and 90 day compliance reports Y / N / NA
Any other requirements Y / N / NA

If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? Y / N
Explain any unresolved actions:
Nothing required at last inspection.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *62*
6. Shifts/Day: *2*
7. Production Days/Year: *365*
8. Hours/shift: *12 (4 crews)*

9. Any production changes since the last inspection? Y / N
If yes, explain:
Resin has picked up, but the automotive side of the facility has leveled out.

10. General facility description and operations:

Manufacture high molecular weight polyester and automotive adhesives.

FACILITY OPERATIONAL CHARACTERISTICS (CONTINUED)

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:

12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

The facility received the PTI for the scrubber water and neutralization system. It has not yet been installed. The facility is operating 24 hours a day, seven days a week. The scrubber water is still being hauled off-site for disposal.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

There is an in-line filter to remove any pellets that might be in the transport water. There will be a pH neutralization system associated with the scrubber water discharge, but the piping associated with this has not been installed. The facility will re-apply for their PTI when they would look at discharging to the sewer.

14. Was a PTI issued for the treatment system? Y/N

15. Were there any modifications to the treatment system since the previous inspection? Y/N

If yes, was a PTI obtained? Y/N

PTI Number: 728856

Date: 12/22/2010

16. What is the treatment mode of operation? Batch /-Continuous /-Combination

If batch, list the frequency and duration:

Approximately one batch every ten to twelve hours as an average, and one batch every six hours as a maximum. Approximately 2,000 gallons are discharged for a period of fifteen to thirty minutes.

17. Who is responsible for operating the treatment system?

NA

18. How often is the treatment system checked?

NA

WASTEWATER TREATMENT (CONTINUED)

19. Is there an alarm system for the system? Y/N
Explain:

There is a level alarm on the tank to allow for the batch discharge.

20. Is there an operations and maintenance manual? Y/N

21. Is an inventory of critical spare parts maintained? Y/N
If yes, list:

22. Are there any bypasses in the system? Y/N
If yes, describe the location:

Have bypasses occurred since the last inspection? Y/N

Was the POTW notified? Y/N

23. Are residuals or sludges generated? Y/N

Method of disposal:

The non-hazardous waste is disposed of through Rumpke. The hazardous waste is disposed of by Safety-Kleen, Veolia and Clean Harbors, based on availability. Clean Harbors takes lab packs when the facility has them. United Waste Water Services takes the scrubber water from the other portions of the facility.

Frequency and amount of disposal:

UWW – Scrubber water -- 5,000 gallons every six to eight weeks; Clean Harbors and Veolia (based on availability) -- Bulk waste – 5,000 gallons every twelve to fifteen days; Safety Kleen - Drums -- 92 drums every 45-60 days. Disposers of hazardous waste are subject to change based on disposal pricing and availability.

Name of hauler/landfill/disposal facility:

Is any sludge generated subject to RCRA regulations? Y/N

If land applying sludge, is there a sludge management plan? Y/N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
<i>Transport Water (Crystallization Tank Water)</i>	<i>End-of-Process</i>	2,000	1,400		
Total Regulated Process Flow		2,000	1,400		
Non-Contact Cooling			5,760 avg; 11520 max		<i>Air conditioning condensate is also discharged to sewer. None of the dilution flows are present at the sampling location.</i>
Blowdown			6,000		
Reverse Osmosis			--		
Demineralizer Regeneration			70		
Filter Backwash			1,800		
Compressor Condensate			0		
Storm Water			--		
Other Dilute Flows			--		
Unregulated Flows (provide list)			--		
Sanitary					
TOTAL FLOW			9,270		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

The blowdown and compressor condensate are being discharged through a different sanitary sewer. There is now an oil/water separator on this line. The facility has coverage under the general industrial storm water permit. (See attached report for additional detail.)

SELF MONITORING

26. Sample location(s) described in the facility's permit:

The effluent from the overflow (surge) tank prior to the flow meter and after the solids filtration unit. The scrubber has not yet had installation completed or discharged.

27. Is the facility sampling at the location(s) described in the permit? Y / N
If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? Y / N
If no, indicate a representative location:

29. Is the flow measured or estimated? Measured / Estimated

If measured, how often is the meter calibrated?

The overflow goes through a flow meter prior to discharging to the sewer system.

If estimated, describe method of estimation:

30. Is pH monitored continuously? Y / N
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? Y / N
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y / N
Monitoring frequencies Y / N
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N
Flow proportioned samples Y / N
Proper preservation techniques ***Need to note what other preservation methods are.*** Y / N
Sample holding times Y / N
Chain-of-custody forms Y / N

33. Are samples analyzed in accordance with 40 CFR 136? Y / N

34. Laboratory conducting analyses:

Belmont Labs

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / N
If yes, identify organics:

The Thixon process has organics that are used, but there is no discharge to the sanitary sewer from this area at the current time. The facility will be revising its permit to allow for this discharge.

36. Does the facility have a current toxic organic management plan(TOMP)? NA Y / N
If yes, is it being implemented? Y / N

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y / N

38. Does the facility need a spill prevention plan or slug discharge control plan? Y / N
If yes, does the facility have a written plan? Y / N

39. Identify any potential slug load or spill areas:

The facility has a storm water pollution prevention plan and an SPCC plan.

REQUIRED FOLLOW-UP ACTIONS

Rohm and Haas Chemicals LLC needs to note what the other preservation methods are on the chain-of-custody forms.

Process Schematic - Rohm and Haas West Alexandria

Polyester Process

