

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

October 11, 2012

Mr. Mark Arnold, Sustainability and ISO Leader  
Owens Corning Insulating Systems LLC  
400 Case Avenue  
Newark, OH 43058

**Re: Owens Corning Insulating Systems LLC  
NPDES Permit 4IN00002/ OH0101753  
Compliance Evaluation Inspection  
Licking County**

Dear Mr. Arnold:

On October 3, 2012, a Compliance Evaluation Inspection was conducted at Owens Corning Insulating Systems LLC. Present for the inspection were you and Cliff Merritt representing Owens Corning and Harry Kallipolitis and myself representing the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the settling ponds. Please see the attached inspection report for the findings of the inspection.

It is my understanding that Mr. Kallipolitis will be contacting you soon regarding improvement opportunities associated with the sediment pond design for impoundments one and two. In the interim, please evaluate Ohio EPA's standard for proper sediment pond design at the following link:

- <http://www.dnr.state.oh.us/portals/12/water/rainwater/Rainwater2009-6-23/6-23-09RLDFiles/6-24-09RLDCh6.pdf>

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at [paul.vandermeer@epa.ohio.gov](mailto:paul.vandermeer@epa.ohio.gov).

Sincerely,

Paul L. Vandermeer  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

cc: Paul L. Vandermeer, Harry Kallipolitis

PLV/nsm Owens Corning 4IN00002

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NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00002	OH0101753	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
10/3/2012	10:20 am	11:50 am	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Owens Corning Insulating Systems LLC 400 Case Avenue Newark, OH 43058	4/1/2009
	Permit Expiration Date
	3/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Cliff Merritt, Senior Principal Engineer	(740) 321-5702
Name and Title of Responsible Official	Phone Number
Arnold, Mark, Environmental Leader	(740) 328-2410

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	TSS remains a problem
S	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	Contract laboratory is Microbac

Comments:

Signatures			
	10/9/12		10/9/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

## Compliance Data for Owens Corning Insulating Systems LLC between 3/1/2011 to 10/1/2012

### Summary

Permit Effluent Limit Violations: 6

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	004	Total Suspended Solids	30D Conc	35	56.	6/1/2011
June 2011	005	Total Suspended Solids	30D Conc	35	43.	6/1/2011
December 2011	004	Total Suspended Solids	30D Conc	35	37.5	12/1/2011
March 2012	005	Total Suspended Solids	30D Conc	35	35.5	3/1/2012
May 2012	005	Total Suspended Solids	30D Conc	35	86.	5/1/2012
May 2012	005	Total Suspended Solids	1D Conc	70	86.	5/18/2012

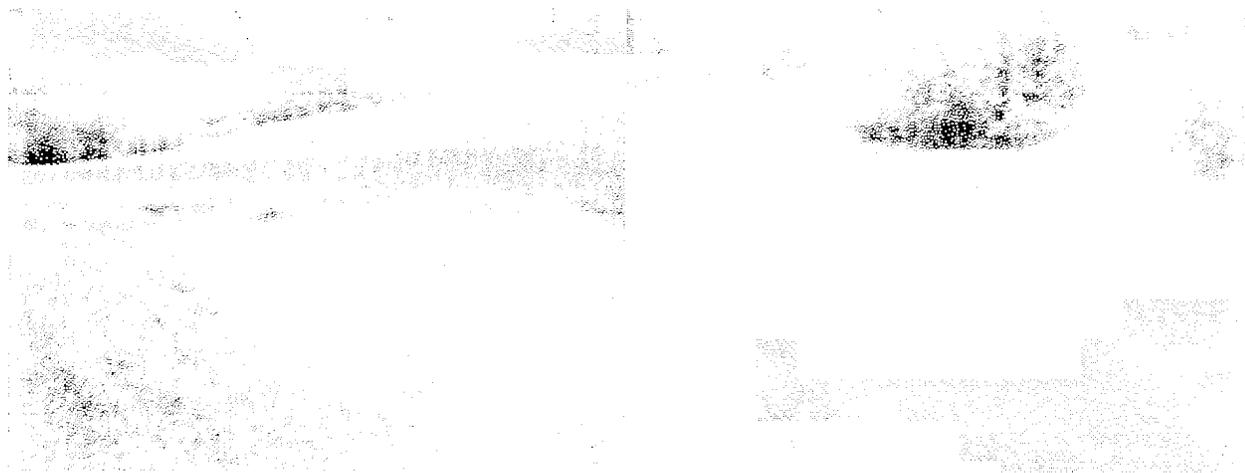


Figure 1. Photographs of the south (left) and north (right) ponds at the Owens Corning, Newark Plant. Note the colloidal clay clouding the (nearly empty) ponds even though there has been little rain over the last few weeks.

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application ..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application ..... Y
- (f) New treatment process added since last inspection ..... N
- (g) Notification given to State of new, different or increased discharges ..... NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments:

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... Y\*
- (b) Permittee is taking actions to resolve violations ..... Y\*
- (c) Permittee has a compliance schedule ..... N
- (d) Permittee is meeting compliance schedule ..... NA

Comments: *Suspended solids violations are due to problems with colloidal clay runoff from the working areas of the landfill. This material does not settle within the ponds and when the ponds discharge, suspended solids violations regularly occur (Figure 1). The company is experimenting with addition of polymer to promote settling of the colloidal clay and so ameliorate the effluent limit violations for suspended solids. Once the experimentation is completed, the company may need to submit a permit to install for modification of the treatment system. The company shall notify Paul Vandermeer and Harry Kallipolitis of the findings of the polymer addition research within 45 days of completion.*

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... Y  
If yes, what type? *Diesel generator*
- (b) Adequate alarm system available for power or equipment failures ..... Y
- (c) All treatment units in service other than backup units ..... Y
- (d) Wastewater Treatment Works classification ..... NA
- (e) Operator of Record holds unexpired license of class required by Permit.. NA  
Class held:
- (f) Copy of certificate of Operator of Record displayed on-site ..... NA
- (g) Minimum operator staffing requirements fulfilled..... NA
- (h) Routine and preventative maintenance scheduled and performed ..... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained ..... NA

KEY: Y – Yes, N – No, NA – Not Applicable, NE – Not Evaluated, \* Further comment included in attachment

- (k) Any plant bypasses since last inspection ..... NA
- (l) Regulatory agency notified of bypasses ..... NA  
     By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection ..... N

Comments:

**SECTION G: RECORD KEEPING**

- a) Log book provided ..... NA
- b) Format of log book (i.e. computer log, hard bound book) ..... NA
- c) Log book(s) kept onsite in an area protected from weather ..... NA
- d) Log book contains the following:
  - i) Identification of treatment works ..... NA
  - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... NA
  - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... NA
  - iv) Laboratory results (unless documented on bench sheets)..... NA
  - v) Identification of person making log entries ..... NA
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments:

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system:.....
- b) Any collection system overflows since last inspection .....  
     CSO  SSO
- c) Regulatory agency notified of overflows .....
- d) CSO O&M plan provided and implemented .....
- e) CSOs monitored and reported in accordance with permit.....
- f) Portable pumps are used to relieve system .....
- g) Lift station alarms provided and maintained.....
- h) Lift stations equipped with permanent standby power or equivalent.....
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection.....
- j) Any complaints received since last inspection of basement flooding.....
- k) Are any portions of the sewer system at or near capacity.....
- l) Are operations changed during high-flow events? .....

Comments: *Section not applicable.*

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge adequately disposed ..... Y  
Method
- b) If sludge is incinerated, where is ash disposed of..... NA
- c) Is sludge disposal contracted..... NA  
Name.
- d) Has amount of sludge generated changed significantly..... NA
- e) Adequate sludge storage provided at plant..... NA
- f) Records kept in accordance with State and Federal law..... NA
- g) Any complaints received last year regarding sludge..... NA
- h) Is sludge adequately protected (if decantal, pathogen control)..... NA

Comments: *Section not applicable.*

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained..... Y  
Type of device: *Graduated tube, timed fill* Device location: *Outfall*
- b) Calibration frequency adequate ..... Y  
Date of last calibration: *NA*
- c) Secondary instruments operated and maintained..... NA
- d) Flow measurements equipment adequate to handle full range of flows.... Y
- e) Actual flow discharged is measured..... Y
- f) Flow measuring equipment inspection frequency ..... 1/Wk.
- g) Sampling location(s) are as specified by permit..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments:

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3)..... Y
- b) If alternate procedures are used, are they properly approved? ..... NA
- c) Analysis performed more frequency ..... NA  
If yes, are results recorded in permittee's report? ..... NA
- d) Commercial laboratory used:  
Name: *Microbac (Marietta, OH)*  
Parameters analyzed: *All except pH and turbidity*
- e) Quality assurance manual provided and maintained ..... NA
- f) Calibration and maintenance of instruments is satisfactory? ..... NE

Comments:

**SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
004	Yes			Yes^			Tan^	No discharge^
005	Yes*			Yes^			Tan^	No discharge^

Comments: \*Outfall sign for the south pond is facing the pond not the river. Part II.J.2 of the NPDES permit requires that the sign be visible from the river. The company shall reverse the aspect of the sign so that it is visible from the river by November 2, 2012 and submit a photograph of the change to Paul Vandermeer via e-mail once the work has been completed. ^Both ponds are turbid but not discharging. See Figure 1 above.

**SECTION M: MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
- e) Do you notice any unusual odors or strong chemical smells ..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: