



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

May 8, 2013

Mr. David Couchet
Emery Oleochemicals, LLC
4900 Este Avenue
Cincinnati, Ohio 45232

RE: Emery Oleochemicals, LLC, 1GR01382*DG, Inspection

Dear Mr. Couchet:

On April 25, 2013, I conducted a storm water inspection at Emery Oleochemical, LLC (Emery). Jerry Price represented the facility. The purpose of the inspection was to verify compliance with the facility's multi-sector general industrial storm water permit. Emery manufactures a variety of oleochemicals. Any potentially contaminated storm water is captured onsite, treated, and discharged to the combined sewer under a permit issued by the Metropolitan Sewer District of Cincinnati (MSD).

The inspection started with a brief meeting with Jerry Price and you. After this meeting, I completed the attached inspection form, and reviewed the storm water pollution prevention plan (SWP3) with Mr. Price. The plan itself has been updated to reflect the new storm water permit. A site inspection to observe each of the outfalls was also conducted.

Emery has been conducting its monthly and quarterly inspections as required. A copy of the inspection is kept with the SWP3. There are currently five outfalls for the storm water. Subsectors C3 and C5 apply to this facility. Subsector C3 does require benchmark monitoring. This was included in the SWP3. During the inspection, it did not rain. There was no evidence of pollutants leaving the site in the storm water. Turtles have been noted in Mill Creek by Outfall 039. One was observed during the inspection. The bioswale had its Monarch Way Station and National Wildlife Federation certifications posted at the bioswale.

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Emery has been implementing green infrastructure onsite. During 2011 and 2012, a bioswale was installed along the east side of Mill Creek. This eliminated an outfall. On the day of the inspection, the vegetative cover was beginning to grow. Small orange flowers were blooming in the bioswale. Emery's goal is to eliminate all of its point source storm water discharges through green infrastructure. U.S. EPA has additional information on green infrastructure on its web page. A link for this is:

<http://water.epa.gov/infrastructure/greeninfrastructure/>

The assistance provided was appreciated. Should you have any additional questions, please contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

Enclosures

MP/tb

cc: Jerry Price, Emery Oleochemicals, LLC



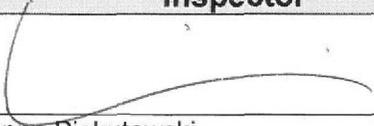
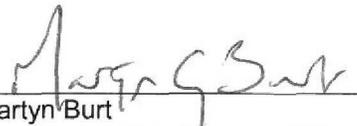
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OHR000005	1GR01382*DG	04/25/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Emery Oleochemicals, LLC 4900 Este Avenue Cincinnati, Ohio 45232	11:30 am	07/01/2012
	Exit Time	Permit Expiration Date
	1:30 pm	12/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jerry Price, Environmental Specialist	(513)762-2568	
Name, Address and Title of Responsible Official	Phone Number	
David Couchet, GM North America Emery Oleochemicals, LLC 4900 Este Avenue Cincinnati, Ohio 45232	(513)762-2500	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	S	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See cover letter.	
Inspector	Reviewer
 Date 5/8/13	 Date 5/8/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Industrial Storm Water Compliance Evaluation Inspection;

Name of facility: Emery Oleochemicals, LLC

Address: 4900 Este Avenue, Cincinnati, OH 45232

Permit number: 1GR013820*DG

Applicable permit sector: C3 & C5

Date of visit: 04/25/2013

Time started: 11:30 am

Time ended: 1:30 pm

Facility representative: Jerry Price

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 was modified to reflect the new multi-sector general industrial permit.

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.

Exposed materials are in containment areas that are valved shut. Any storm water is checked prior to discharge so no contaminants are exposed.

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 . ~~Y~~/N/~~Not sure~~

The facility has installed a bioswale, and has on-site valved collection areas for storm water. The bioswale has eliminated an outfall. Additional green infrastructure will be installed over the next couple of years.

E. No. outfalls from site/no. inspected 5/5

The third outfall is counted as 003 and 004 to account for the ground water. There are three pipes discharging from the facility.

E1. Did any show evidence of pollutants discharged in the storm water? ~~Y~~/N

If yes, describe: **NA**

F. Other observations/comments;

Outfall 009 has been grouted closed. There is no discharge.

Outfall 007 had a trickle of clear ground water. This had been slated for a green infrastructure project.

Outfall 016 had no discharge. It is to be eliminated by June 1, 2013. It would take a substantial rain for a discharge. It will be rerouted to the bioswale.

Outfall 025 had no discharge. This project is slated for a green infrastructure in the 2014 budget.

Outfall 036 had no discharge. The costs for this green infrastructure project have been determined, and are waiting on the approval of the capital. It should be in the 2014 budget.

Outfall 039 had no discharge. There was a turtle in Mill Creek by this outfall on the day of the inspection. This is the third year where turtles have been present at this location.