



State of Ohio Environmental Protection Agency

Central District Office

MAILING ADDRESS:

REET ADDRESS:

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P.O. Box 1049
Columbus, OH 43216-1049

February 26, 2006

Plant Manager
Arctic Express
4277 Lyman Drive
Hilliard, OH 43026

R: Complaint Investigation at Arctic Express

Dear Sir or Madame:

On February 11, 2003, I conducted a preliminary storm inspection associated with your site. The inspection was the result of an anonymous complaint submitted to our Office regarding poor fluid management, namely oil.

Based on my site observations and 40 CFR 122.26, I believe this facility will require coverage under a General Storm Water Permit associated with Industrial activities. Additional Information regarding permit coverage can be found at: http://www.epa.state.oh.us/dsw/storm/industrial_index.html.

Based on the current storm water requirements found in OAC 3745-39-04 and 40 CFR 122.26, the follow items will require attention

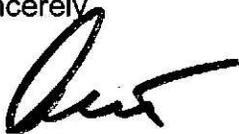
- **Storm Water Pollution Prevention Plan (SWPPP)** The general permit requires the development of a SWPPP which assesses all external storage and processing areas which may pose a contamination threat to storm water. The intent of the SWPPP determines the potential threat associated to storm water contamination and provides means for the implementation of best management practices to minimize the potential of contamination. Guidance Documents for developing acceptable SWPPP's can be found at: <http://www.epa.gov/npdes/pubs/owm0236a.pdf>.
- **Storm Water Permitting Requirements:** In accordance with 40 CFR 122.26 and OAC 3745-39-04, this facility must seek coverage under the "General Storm Water Permit Associated with Industrial Activities." The general permit is a National Pollutant Discharge Elimination System (NPDES) permit which authorizes the release of storm water associated with your facility. The Notice of Intent (NOI) application and permit can be found at the following address: <http://www.epa.state.oh.us/dsw/storm/stormform.html>. The SWPPP must be developed prior to the submittal of the NOI application.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

- **Fluid Management:** During the investigation, I noted numerous barrels in areas which pose a significant risk to storm water quality (see attached photos). In addition, I noted oil staining near the docks as seen in the attached photos. Corrective measure should be implemented as quickly as possible to avoid direct violation of the Clean Water Act. It is highly recommended that all barrels containing any fluids are stored in areas of secondary containment with appropriate de-watering protocols of all diked storm water which may accumulate. Relocating the barrels inside the facility is an acceptable alternative.
- **Vehicle/Equipment/Part Washing:** All wash water associated with this facility is considered a processed wastewater and is not an authorized discharge under the General Storm Water Permit. All wash water must be collected and disposed at a public owned treatment works (POTW), directed to a sanitary sewer, with the approval of the municipality, or discharged via an individual NPDES permit.
- **Training:** All key personnel must be trained with respect to the contents of the SWPPP on an annual basis in accordance with the conditions of the General Permit.

If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at (614) 728-3844. In addition, please provide a written response within 10 days from receipt of this letter. A joint follow up inspection will be conducted at your convenience, but no later than 45 days from the receipt of this letter.

Sincerely,



Harry A. Kallipolitis
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: Jeff Bohne, Water Quality Supervisor, CDO



