



State of Ohio Environmental Protection Agency

Central District Office

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

MAILING ADDRESS:

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

March 19, 2007

Phil Key
Key Homes Inc.
202 East Broad Street
Pataskala, OH 43062

Dear Mr. Key:

This letter is written regarding the storm water inspection I conducted at Sugar Mill Subdivision in Licking County, on March 12, 2007. I understand that these construction activities are currently covered under the General Storm Water Permit Associated with Construction Activities. Based on the site inspection and the General Storm Water Permit, the following items must be addressed:

Sediment & Erosion Controls:

The site has been covered with a temporary mulch cover as requested in my previous inspection report. Please ensure to maintain diversions to the sediment pond concurrent with the re-commencement of construction activities.

If you have any questions regarding this letter or the inspection, please do not hesitate to call me at our Central District Office at (614) 728-3844.

Sincerely,

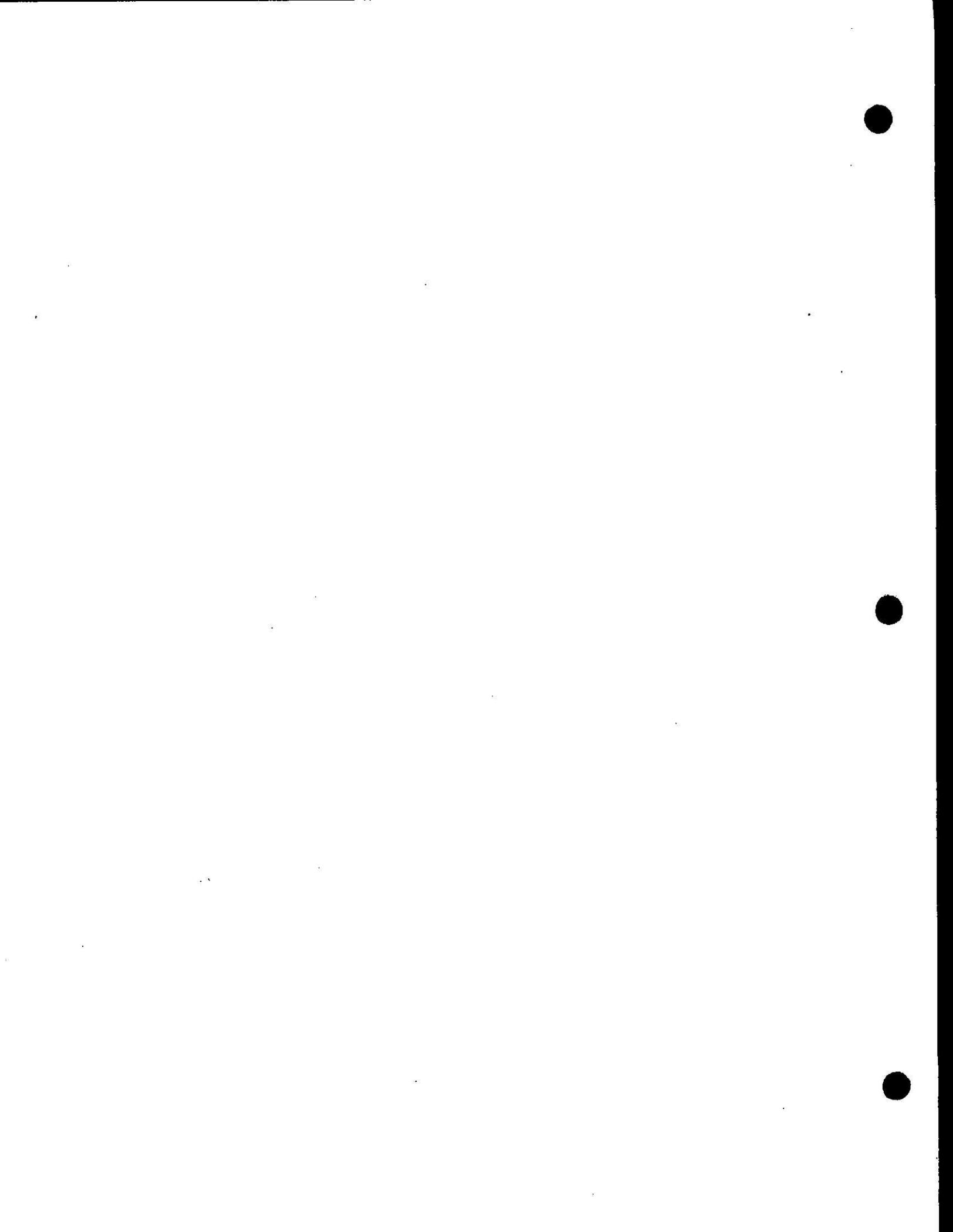
Harry Kallipolitis
Storm Water Coordinator
Ohio EPA, Division of Surface Water
Central District Office

c: Jeff Bohne, DSW/CDO

HK/nsm Sugar Mill Subdivision 3-12-07

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

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March 19, 2007

RE: Notice of Violation

Randall Hall
Columbus Auto Shredding
2181 Alum Creek Drive
Columbus, OH 43207

Dear Mr. Hall:

This letter is written as follow up to a joint storm water inspection we conducted at Columbus Auto Shredding, located on 2181 Alum Creek Drive in Columbus, Ohio. City of Columbus, Division of Sewers and Drains was present at this inspection. The inspection, conducted on March 7, 2007, was performed to evaluate your storm water controls and permitting requirements under 40 CFR 122.26. This letter also serves as a formal Notice of Violation for the discharge of process water associated with the wet fluff line in violation of the Ohio Revised Code (ORC), Chapter 6111.04.

I understand you are currently seeking a conditional exemption from the storm water permitting requirements based on the no exposure criteria. During the inspection the following items were noted:

- 1. Proposed Salvage Yard:** As you stated during the inspection, a salvage yard is proposed on the property directly adjacent to Columbus Auto Shredding. Please note, this site will require coverage under our General Storm Water Permit Associated with Industrial Activities. A Storm Water Pollution Prevention Plan must be developed in accordance with the conditions of the General Permit. Guidance documents for developing a SWPPP can be found at: <http://www.epa.gov/npdes/pubs/owm0236a.pdf>. The SWPPP must be developed prior to the submittal of your Notice of Intent Application, which can be found at: <http://www.epa.state.oh.us/dsw/storm/stormform.html>.
- 2. Shredding Operations:** The majority of the shredding operations at this facility were conducted under roof (see photo). Please note, Ohio EPA recognizes this Best Management Practice (BMP) as a very effective tool in minimizing the threat of storm water contamination.
- 3. Vehicle Tracking:** I did note minor tracking of oil and grease outside of the facility associated with loading and unloading of vehicles (see photo). Daily inspection of the grounds to identify these threats should be conducted to ensure prompt and effective clean up measures are implemented to minimize this threat to storm water.

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

4. **Storm Water Ponds:** I noted the storm water ponds associated with this site. I highly recommend these ponds be converted to discharge below the normal pool elevation. This provides an opportunity to visually inspect the ponds for the presence of oil and grease to ensure prompt and effective removal. I have enclosed guidance documents to assist you in this process.

5. **Wet Fluff Line:** During the inspection, we noted the external fluff line resulted in contaminated discharges of oil and grease (see photo). Given this is a result of your shredding operations and not storm water, it would be considered a process waste water and not authorized for discharge without the express permission from the Director of Ohio EPA via a National Pollutant Discharge Elimination System (NPDES) permit. At the time of the inspection I agreed to your short term and long term corrective measures to eliminate this discharge. The short term measures consisted of re-routing this discharge to your sanitary system. It is my understanding this has been completed, please verify in your response letter. The long term solution consists of placing this area under roof. You indicated this would be completed in approximately 90 days. The discharge from this area noted on the day of the inspection is a direct violation of ORC 6111.04. Please note your "no exposure exemption" will not be granted until this processing area is under roof.

6. **Fluff Pile:** There was a small fluff pile outside during the date of this inspection. All fluff must be stored inside under roof at all times to be eligible for the conditional storm water exemption from permitting.

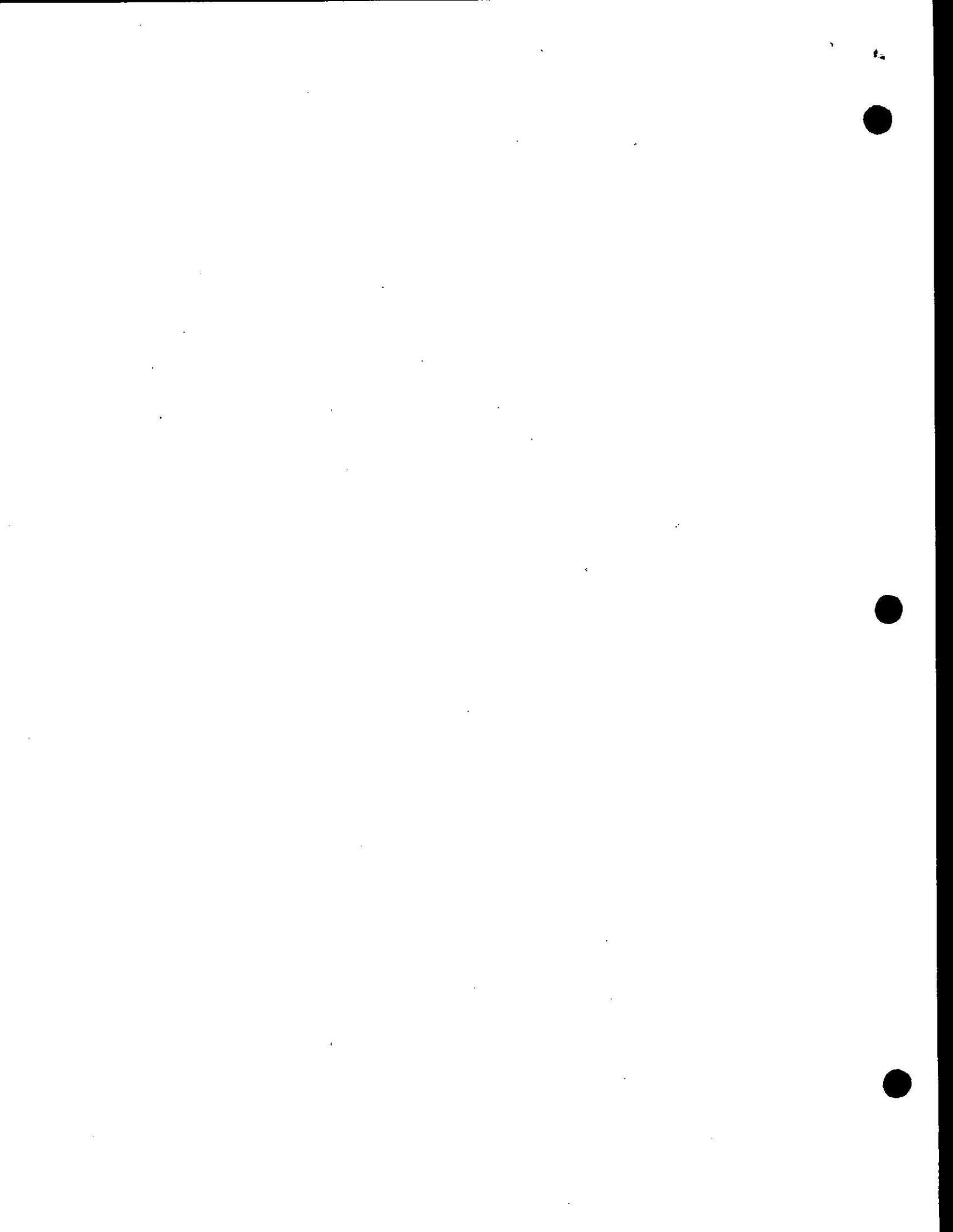
If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3844. In addition, please provide a written response to this letter within in 10 days of receipt.

Sincerely,



Harry Kallipolitis
Environmental Specialist
Division of Surface Water
Central District Office

c: Jeff Bohne, Water Quality Supervisor, DSW-CDO
Scott Shields, City of Columbus, Division of Sewers and Drains



Columbus Auto Shredding
2181 Alum Creek Drive
Columbus, Ohio 43207

Alum Creek Watershed
Photo by Harry Kallipolitis on March 7, 2007

Fluff conveyer belts exposed to storm water
and associated run-off

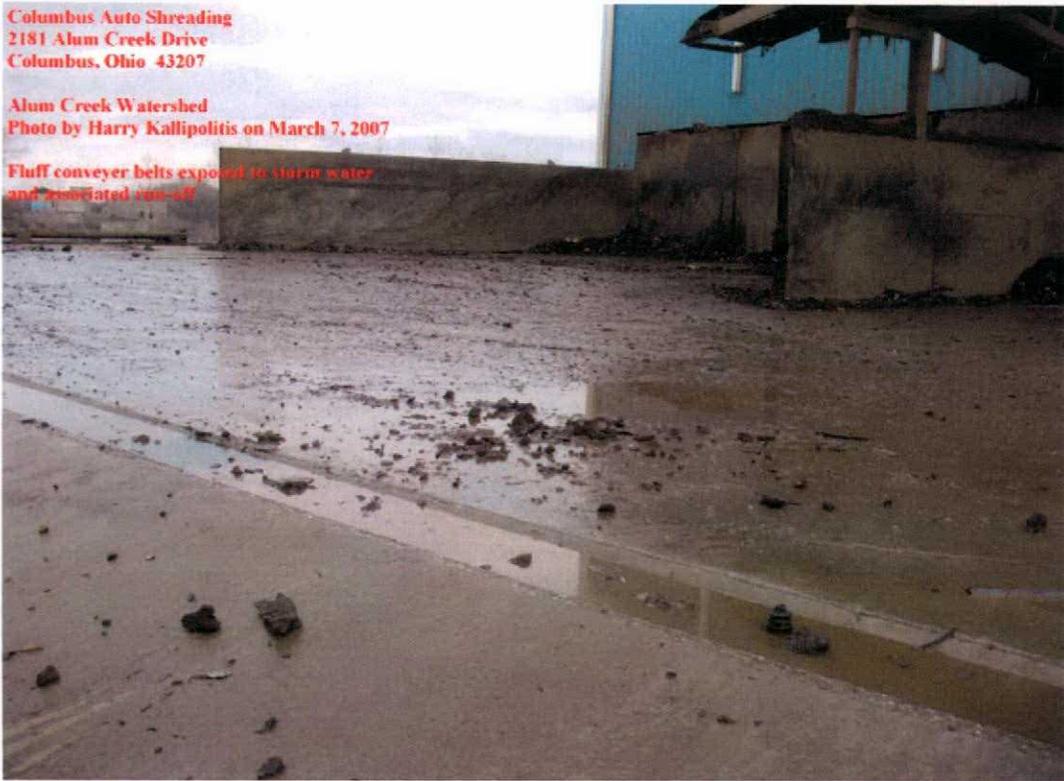


Figure 3 External Fluff Line and associated illicit discharge

Columbus Auto Shredding
2181 Alum Creek Drive
Columbus, Ohio 43207

Alum Creek Watershed
Photo by Harry Kallipolitis on March 7, 2007

Fluff storage pile exposed to storm water



Figure 4 All Fluff piles must be stored under roof

