



Environmental  
Protection Agency

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

September 30, 2011

Steve Smogielski  
Con-Way Freight  
110 Parkland Plaza  
Ann Arbor, MI 48103

**Re: Industrial Storm Water Inspection at Con-Way Freight  
Franklin County  
Permit #4GR00154\*DG**

Dear Mr. Smogielski:

This letter is written in follow-up to a preliminary industrial stormwater inspection I conducted at Con-Way Freight, located at 2625 Westbelt Drive, Columbus, Ohio, 43228 on September 14, 2011. I understand this facility is currently covered under our Industrial Storm Water permit. The purpose of the inspection was to evaluate compliance with the general permit associated with the materials and processes exposed to storm water at this facility. Based on my preliminary site observation and the conditions of the general permit, the following observations were noted:

- **Storm Water Pollution Prevention Plan (SWPPP):** a SWPPP must be developed specifically for this facility. The SWPPP must identify all materials and processes which have the potential for contaminating storm water runoff. A site map must be developed depicting all drainage patterns, location of all exposed materials and processes, and the associated Best Management Practices (BMP) utilized to minimize storm water contamination. The SWPPP must be on-site available for review. Please refer to the following link to reference for developing a SWPPP:  
[www.epa.gov/npdes/pubs/industrial\\_swppp\\_guide.pdf](http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf)
- **Tank Farm:** The large diesel storage area was noted on the southwestern portion of the site. Secondary containment has been provided for the large diesel tank farm. Dewatering protocols must be incorporated into the SWPPP in order to discharge accumulated storm water within the area of secondary containment. A discharge log is expected incorporating the time of release, the authorized representative, the approximate amount, and any results from testing to ensure storm water is free from contamination. The dewatering log should be inclusive with the SWPPP for review.

- **Fueling Island:** The fueling island was under roof. This is an acceptable BMP associated with this site.
- **Vehicle washing:** I noted a car wash is established for vehicle washing at this site. All mobile power washing activities must be conducted in such a manner where the wash water is collected and properly disposed.
- **Barrel / tote storage:** I noted several barrels and totes located directly adjacent to the diesel storage tank form. These vessels should be removed and placed in an area where secondary containment is provided.
- **Vehicle maintenance:** Vehicle maintenance was conducted under roof. Please ensure all interior drains associated with this facility are routed to sanitary and not storm sewer systems.

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  
Division of Surface Water  
Central District Office

c: Jeff Bohne, Water Quality Supervisor, DSW/CDO