



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

April 7, 2009

Mr. Marty Kilberg,  
Plant Manager  
CTC Composite Technologies  
401 North Keowee Street  
Dayton, Ohio 45404

**RE: Complaint Investigation, Industrial Stormwater, Unpermitted Facility**

Dear Mr. Kilberg:

On Tuesday, March 24, 2009, I inspected CTC Composite Technologies' Keowee Street facility in response to a complaint initially received by Dave Combs from OEPA's Special Investigations Unit. Michele Simmons from the City of Dayton's Water Department participated in this inspection.

The complainant alleged that water used in the plant's compounding department was being discharged into storm sewers on the property. The complainant also alleged that poor materials handling practices have resulted in plastic pellets being carried off the site in stormwater runoff, via both public and private storm sewers, and discharged to the Mad River.

Dave Combs' recent inspection confirmed that process water from the compounding area was being discharged outside where it could potentially flow into a storm sewer inlet and be discharged off the property. Since that inspection, CTC has determined that process changes could be implemented that would allow water to evaporate from the vessels in which it is being used, thereby eliminating discharges.

Based on my observations, it appears the second allegation is valid. Small plastic chips and plastic pellets were observed all around the plant site, both indoors and outdoors. Prior to meeting with you, Michele and I confirmed the presence of several different kinds of plastic near outlet pipes located at the base of the wall at the company's southern boundary. Plastic pellets were also observed downhill from the outlet pipe (labeled MRR-08, part of the city of Dayton's storm sewer system), across the bike path and near the edge of the Mad River. During times of moderate to high flow, plastic pieces would end up in the river.

**Discharges of plastic off site into waters of the state is a violation of Ohio Revised Code Section 6111.** The company must obtain coverage under a National Pollutant Discharge Elimination System (NPDES) Industrial General permit, which authorizes the discharge of clean stormwater from industrial sites. A primary

Mr. Marty Kilberg  
April 6, 2009  
Page 2

component of this permit is the creation and implementation of a Stormwater Pollution Prevention Plan (SWP3), which requires the company to fully evaluate, and then improve, its materials handling practices so that plastics, both waste and raw material, are not carried off the site in stormwater runoff. From our site tour, significant opportunities appear to exist to improve some of the ways in which plastics are managed by the company.

Obtaining coverage under a NPDES general industrial stormwater permit involves completing a one page "Notice of Intent" (NOI) application form along with a fee of \$350. The completed NOI and fee is to be sent to Ohio EPA's Central Office in Columbus. The address may be found at the top of page 2 of the NOI application instructions document found (along with the NOI form) at the following link to Ohio EPA's webpage:

<http://www.epa.state.oh.us/dsw/storm/stormform.html>

The NOI form is the first document listed in green hypertext at the very top of the page, and the NOI application instructions is next. The actual industrial permit itself is under the "general permits" heading located near the bottom of the page.

Coverage under this permit must be obtained immediately. Please submit a copy of the completed NOI form to this office within a week of its being acquired. An electronic version of the completed form is preferred.

A copy of the SWP3 developed for the site must be submitted to this office within 60 days of receipt of this letter. If you have questions about anything pertaining to this permit and what it requires, please contact me at 937.285.6442.

Sincerely,



Chris Cotton  
Ohio EPA, Division of Surface Water

Cc: Michele Simmons, City of Dayton Water Dept  
Andrew Conway, Enforcement Coordinator, OEPA/DSW/CO  
Dave Combs, OEPA/SWDO/DERR  
OEPA/SWDO/DSW Files

CC/plh