



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

Central District Office

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

MAILING ADDRESS:

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

January 29, 2010

Spencer Malcolm
Mondi Akrosil
3165 Wilson Road
Lancaster, OH 43130

**Re: Akrosil / Fairfield County
Industrial Storm Water Permit 4GR00295*DG**

Dear Mr. Malcolm:

This letter is written in regard to the storm water inspection that I conducted at Akrosil, located at 3165 Wilson Road, in Lancaster, Ohio. The inspection was conducted on January 27, 2010, to determine compliance with your industrial storm water general permit. You stated that your company manufactures silicone-coated release liners for pressure sensitive products. Upon entering your facility, I had to wait approximately 15 minutes in the lobby and your office in order to find an appropriate person to discuss the industrial storm water issues with me. The person who normally handles the environmental issues was out of the office. During a previous inspection, issues were noted with the lack of secondary containment for the heptanes & toluene storage tanks, power washing components outside and the lack of protocol for discharging from a diked area. Please see attached letter from previous site inspection. The following items were noted during the inspection:

1. The heptane and toluene storage tanks had secondary containment.
2. Power washing was no longer done at the facility.
3. Your facility had a spill prevention plan and spill kits were located through-out the facility.
4. There was empty drum storage outside of the facility, however, all drums were closed and banded. No staining or discharge on the pavement near the drums was observed.
5. No one at the facility could comment on the protocol for discharging from a diked area. Since the environmental person, Mr. Mike Smith, was not at your facility, it appeared that there was a critical lapse in protocol for handling of industrial storm water. It is recommended that several people at your facility be taught the protocol of discharging from a diked area, as well as, the handling of industrial storm water. Also, please provide your current protocol from discharging of storm water from the diked area. The date, amount, results from inspections and/or testing, and the person releasing the storm water should be documented and kept in the Storm Water Pollution Prevention Plan.

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

Spencer Malcolm
Mondi Akrosil
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If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosures

c: Jeff Bohne, DSW/CDO
Mike Smith, Mondi Akrosil

GS/nsm Akrosil, January 27, 2010

Central District Office

STREET ADDRESS:

3232 Alum Creek Drive
Columbus, OH 43207-3417

TELE: (614) 728-3778 FAX: (614) 728-3898

MAILING ADDRESS:

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

April 28, 1997

Re: Akrosil

Debbie Phillips
Akrosil
3165 Wilson Road
Lancaster, Ohio 43130

Dear Ms Phillips:

On Monday April 14, 1997, Cathy Alexander, of Ohio EPA, Division of Surface Water, and I conducted a storm water inspection at Akrosil, located in Fairfield County. The purpose of the inspection was to determine the appropriate NPDES (National Pollutant Discharge Elimination System) permitting approach to authorize the discharge of storm water. In addition, the BMPs (Best Management Practices) were evaluated during the inspection. Based on our site observations this facility may authorize the release of storm water under the General Storm Water Permit Associated with Industrial Activities. Please complete and submit the Notice of Intent application I left with you during the inspection. Based on the conditions of the General Permit the following items should be addressed to minimize the potential threat to storm water quality:

Storm Water Pollution Prevention Plan (SWPPP): A Storm Water Pollution Prevention Plan must be developed specific for this facility. The SWPPP identifies all potential threats to storm water quality and assesses the associated Best Management Practices (BMPs) for effectiveness. A site map must be included in the SWPPP delineating all drainage patterns, potential risk areas, and associated BMPs. I left US EPA's Guidance Documents for Developing Effective Storm Water Pollution Prevention Plans to aid you in this process.

Haptene and Toluene Unloading Area: Secondary containment should be provided for the unloading of Toluene and Haptene. A containment area would greatly reduce the potential threat to storm water quality since this unloading area is directly adjacent to a drainage swale.

Power Washing: During the inspection we noted the use of a power washer on site. Be aware, the General Permit does not authorize the release of wash water associated with these operations. All wash water must be collected and/or directed to a sanitary sewer.

Diked Water Discharge Protocol: A discharge protocol should be developed for the release of storm water associated with the tank farm located on site. The date, amount, results from inspection and/or testing, and the person releasing the storm water should be documented and kept in the Storm Water Pollution Prevention Plan.

Debbie Phillips

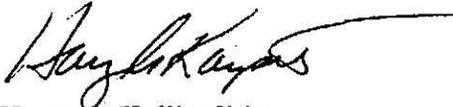
Re: Akrosil

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SARA Title IV, Section 313 Water Priority Chemical: Monitoring of storm water would be required on an annual basis if the facility is considered a Section 313 facility. Be aware, if the unloading and storage is conducted in such a manner which would not potentially affect storm water quality, this requirement would not apply.

If you have any questions regarding this letter or my inspection, please do not hesitate to call me at our Central District Office at (614) 728-3844. In addition, please provide a written response to the action items addressed above within 10 days from receipt of this letter.

Sincerely,



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

HAK/pan
akrosil.497

pc: Cathy Alexander, Ohio EPA, DSW/CDO
Jeff Bohne, Ohio EPA, DSW/CDO