



State of Ohio Environmental Protection Agency

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

December 17, 2009

Carrie Starr  
Universal Veneer Mill Corporation  
1776 Tamarack Road  
Newark, OH 43055

**Re: Storm Water Inspection at Universal Veneer Mill Corporation**

Dear Ms Starr:

This letter is written regarding our joint storm water inspection of Universal Veneer located in Newark, Ohio on December 7, 2009. This site is currently covered under the "General Storm Water Permit associated with Industrial Activities". The purpose of the inspection was to evaluate compliance with the General Storm Water Permit. Based on my site observations and the conditions of the General Permit, the following items were addressed:

- **Storm Water Pollution Prevention Plan (SWPPP):** The SWPPP is a condition of the General Permit. The SWPPP identifies all potential threats to storm water. The plan also includes the Best Management Practices (BMP's) implemented at the site to reduce the potential of off-site storm water contamination. Please forward to my attention a copy of your most recent SWPPP.
- **Fluid Management:** During the inspection, we noted several barrels containing various fluids which pose a threat to storm water quality. The fluids were stored outside areas of secondary containment with a storm drain in the immediate vicinity (see photo figure 1). Corrective measures must be taken to ensure all fluids are stored in areas of secondary containment. In addition, I noted potential leaks and pavement staining near the secondary containment structures. Integrity testing must be conducted to ensure the secondary containment structure functions as intended.
- **Diked Water Discharge Protocols:** Diked dewatering protocols and logs are highly recommended. All water discharged from secondary containment structures should be documented and inclusive in your SWPPP. The logs must include the time and date of the release, the

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



- authorized representative conducting the release, the approximate amount, and the results of any tests conducted to ensure the release is not a threat to storm water quality.
- **Annual Training:** At a minimum, annual training must be provided to all key personnel responsible for any implementation of the Storm Water Pollution Prevention Plan. All training and attendance sheets must be inclusive in the SWPPP.
- **Yard Management:** Based on my site observations the yard was full of debris associated with the log storage and the de-barking operations. This debris was directly adjacent to the separate storm sewer systems (see photo figure 2). The use of screens alone in the drop catch basin is not sufficient to minimize the threat to storm water. As a result of the inspection, one of the following options is expected:
  1. Provide treatment of storm water via a storm water impoundment or underground water quality device with approval from Ohio EPA.
  2. Route drainage from the storage yard and de-barking operations to pre-treatment with express permission from the city of Newark.
  3. Implement a closed loop or zero storm water discharge scenario through the use of recycling efforts or roofs.
- **Self Inspections:** Yard inspections are expected in accordance with the General Permit. All external operations and storage must be inspected and logged in your SWPPP. The inspection frequencies should be a minimum of one per week. All inspection logs must be reviewed on an annual basis to determine improvement opportunities with respect to minimizing storm water contamination.
- **External Pre-Treatment Tanks:** Full secondary containment measures must be considered for the external pre-treatment tanks.
- **Log Misting Operations:** The General Storm Water Permit associated with Industrial Activities only authorizes storm water discharges. Several of my past inspections have noted discharges to storm as a result of the log misting operations at this facility. Corrective measures must be taken to route this discharge to pre-treatment or implement a zero discharge scenario. All discharges to pre-treatment must be authorized by the city of Newark.

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If you have any questions regarding this letter or the inspection, please do not hesitate to contact me at our Central District Office at (614) 728-3844. A response letter addressing including a corrective action plan with timelines is expected within sixty days from receipt of this letter.

Sincerely,



Harry Kallipolitis  
Storm Water Coordinator  
Division of Surface Water  
Central District Office

Enclosure

c: Jeff Bohne, Water Quality Supervisor, DSW/CDO  
John G. Trujillo, Storm Water Coordinator, City of Newark  
Nancy Taylor, City of Newark, Environmental Lab

