Ohio | Environmental Protection Agency

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

August 2, 2011

Mark Arnold
Environmental Leader
Owens Corning
400 Case Avenue
Newark, OH 43058

4GR00090*DG

Dear Mr. Arnold:

This letter is written regarding a storm water inspection we conducted at the Owens Corning Manufacturing Facility and associated landfill located in Newark, Ohio on March 30, 2011. Greg Sanders and Jan Rice with Ohio EPA Division of Surface Water were present during this evaluation.

The purpose of the inspection was to evaluate the storm water management components associated with the industrial site as well as the landfill. Based on our site observations, the following items were noted:

Industrial Facility Inspection:

- It is my understanding all storm water from the manufacturing facility is routed to pretreatment and eventually to a sanitary. Please understand this measure results in an exemption from the storm water requirements in association with 40 CFR 122.26. This exemption applies to the manufacturing facility. In the event separation of your pre-treatment and storm is preformed, the exemption is no longer applicable.

- There were areas of concern associated with the secondary containment associated with the pretreatment system. Portions of the secondary containment were utilized as storage and all efforts should be employed to minimize this temporary practice to reduce potential upsets associated with the discharges to the pretreatment system. At this time I ask you to refer to Greg Sanders of the Ohio EPA to determine the next appropriate steps in minimizing this potential threat.

Sanitary Landfill:

- During the inspection we evaluated the sediment ponds and storm water management controls associated with the sanitary landfill at this site.

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- The sediment ponds which serve the sanitary landfill were dry in nature, which results in the potential re-suspensions of solids during successive rain events. During the inspection I asked you consider the implementation of a skimmer device to increase efficiency of the sediment ponds. It is my understanding the skimmer device for both sediment impoundments has been installed.

- It is my understanding you have made contact with Jan Rice regarding recent sampling analysis resulting in violations of your individual NPDES Discharge Permit. At this time I urge you to consider modifying these impoundments to incorporate a wet storage area to increase efficiency.

- The sediment impoundments should be designed to address a sediment storage volume of 67 cubic yards per acre of disturbance and a dewatering volume of 124 cubic yards per acre of drainage. The modification of a dry basin to a wet basin will certainly increase efficiency. Please refer to the following link for assistance: http://www.dnr.state.oh.us/water/rainwater/default/tabid/9186/default.aspx. I suggest increasing the sediment storage and de-watering area to the maximum extent practical utilizing the current pond design.

Monitoring Protocols: During the inspection you requested guidance regarding sampling protocols to ensure compliance with your Individual NPDES Permit. As a result, I am offering the following information:

- The storm event must create an actual discharge from your site ("measurable storm event"). This storm event will vary based on numerous factors at your site, the most obvious being the actual size and duration of the storm event. However, the amount of impervious surface at your facility will impact this as well. Given the majority of the landfill is covered by grass; it will take a larger storm to create a discharge from your site than it would at a facility that is entirely paved. Another factor affecting whether and how frequently you have a measurable storm event will be how frequently rain occurs at your facility and the size of the most recent storms. Saturated soil will generate a stormwater discharge more quickly than dry soil; however, VERY dry soil can also become compacted and become nearly impervious to rain, thereby converting precipitation to runoff quickly as well. You will need to pay attention to your facility's particular characteristics to develop an understanding of what type of rain events or snowmelt results in a discharge eligible for sampling.

- In order to properly characterize rain events at your facility, it is a good idea to begin by documenting each event as part of your facility's routine maintenance activities. You can purchase a simple rain gauge and keep a notebook handy in order to document the dates on which rain occurred and the amount of rain that

fell. You should also consider documenting whether or not an actual discharge from your facility occurred for each rain event. Tracking rainfall amounts and discharge information will help you to better predict which storm events will be measureable and result in a discharge.

- In order to be prepared to take advantage of storms that will result in a "measurable storm event":
    - Be familiar with local precipitation trends, storm patterns, and seasonal variations.
    - Check weather forecasts so you can prepare to sample upcoming precipitation events.

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 or email at harry.kallipolitis@epa.state.oh.us.

Sincerely,

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

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

HK/nsm Owens Corning Manufacturing Facility 3-30-2011