



**Environmental  
Protection Agency**

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

April 14, 2010

RE: MEDINA COUNTY  
BLEACH TECH LLC  
NPDES PERMIT NO. OHR000004  
OHIO EPA PERMIT NO. 3GR01348\*DG  
INDUSTRIAL STORM WATER INSPECTION

Joe Traylinek  
Bleach Tech LLC  
8895 Ryan Road  
Seville, OH 44273

Dear Mr. Traylinek:

On March 30, 2011, Ohio EPA conducted an inspection of Bleach Tech LLC located at 8929 Ryan Road, City of Seville, Medina County (facility). During the inspection, I was accompanied by Bill Schaad, Operations Manager; and Joe Traylinek, Corporate Director of Maintenance and Interim Health, Safety, Environmental Administrator. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01348\*DG.

General Information

- The facility produces sodium hypochlorite, hydrochloric acid, and sodium hydroxide. According to the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA), it appears the industrial activities at this facility are categorized by Standard Industrial Classification (SIC) Code 2819: Industrial Inorganic Chemicals, Not Elsewhere Classified;
- The facility provided a copy of a draft storm water pollution prevention plan (SWP3), dated December 2010; and
- Weekly monitoring of the retention pond that receives storm water runoff is performed for pH, chlorine, and sodium chloride. Monitoring of the retention pond commenced in September 2010. The facility produced records documenting that monitoring is occurring. A copy of the November 1, 2010 analytical results was provided to Ohio EPA.

### SWP3 Deficiencies

The storm water inspection documented the following deficiencies of the General Storm Water Permit that must be addressed in order to prevent a discharge of potential pollutants to "waters of the state:"

- The draft SWP3, dated December 2010, must be finalized and be reflective of current facility operations. The certification statement provided in Section XIII of the SWP3, page twelve, must be signed;
- Section I of the SWP3, page one, provides that the production superintendent, site maintenance supervisor, and corporate safety and environmental administrator are members of the pollution prevention team. The contact information of the members of the pollution prevention team must be provided in the SWP3;
- Section IX of the SWP3, page nine, details that employee training will be provided on a periodic schedule. The facility must clearly define the "periodic schedule" regarding the employee training frequency; and
- Section IX of the SWP3, page ten, details that routine facility inspections will be conducted on a quarterly basis by at least one member of the pollution prevention team with at least one inspection conducted during when a storm water discharge is occurring. The facility was unable to document that the routine facility inspections were occurring. The facility must begin maintaining records that document the quarterly routine inspections are occurring.

### Facility Deficiencies

- Section III of the SWP3, page four, details the best management practices (BMP) that will be implemented to minimize or eliminate the discharge of pollutants associated with the salt storage building. The BMP for the salt storage building is detailed as housekeeping. The storm water inspection documented that spilled salt adjacent to the conveyor has not been addressed (Figure 1). Good housekeeping activities (i.e. sweeping) must occur to address the spilled salt; and
- Section III of the SWP3, page four, details the BMPs that will be implemented to minimize or eliminate the discharge of pollutants associated with the diesel fuel tank. The BMPs for the diesel fuel tank are detailed as containment, inspection, and maintenance. Currently, the diesel fuel tank does not have any containment installed (Figure 2). In addition, a spill kit must be installed near the diesel fuel tank to address the potential for spills and overfills.

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Within thirty (30) days of receiving this inspection letter, written correspondence detailing the BMPs that have been implemented to address the above deficiencies. The SWP3 for the site must be revised to include the BMPs that address the above deficiencies. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at [chris.moody@epa.state.oh.us](mailto:chris.moody@epa.state.oh.us).

Sincerely,



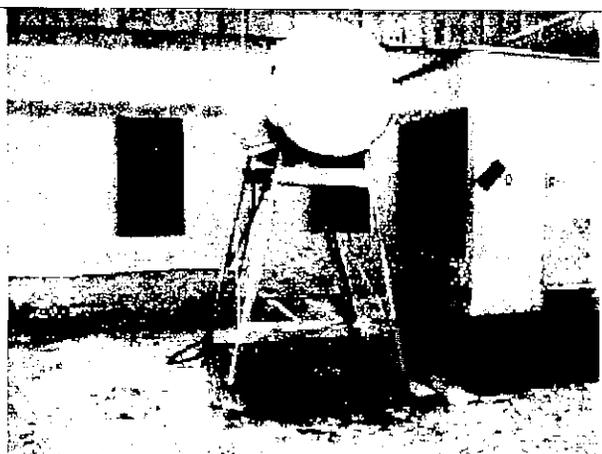
Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM:bo

pc: Bill Schaad



**Figure 1** - Spilled salt adjacent to the conveyor has not been addressed.



**Figure 2** - The diesel fuel tank does not have any containment installed.