



**Environmental
Protection Agency**

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

March 30, 2011

RE: ASHTABULA COUNTY
CITY OF CONNEAUT
CW OHIO, INC.
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR01185*DG
INDUSTRIAL STORM WATER INSPECTION

Mr. Patrick Davin, Manager
CW Ohio, Inc.
1209 Maple Avenue
Conneaut, OH 44030-2120

Dear Mr. Davin:

On March 21, 2011, Ohio EPA performed an inspection at CW Ohio, Inc., located at 1209 Maple Avenue, City of Conneaut, Ashtabula County (facility). During the inspection, you represented the facility. Ohio EPA records indicate that the facility is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01185*DG.

The storm water inspection documented the following deficiencies that must be addressed through the implementation of specific corrective actions:

Bag House Dust Management

The inspection documented that the dust from the bag house is collected in a plastic-lined cardboard box (PLCB) prior to disposal (Figure 1). The PLCB is stored outdoors in an area that is exposed to precipitation events. Unfortunately, the PLCB does not provide a best management practice (BMP) for the windblown particulate matter from the PLCB that is deposited on the ground and tracked by vehicles into the separate storm sewer system serving the facility (Figure 2). The separate storm sewer system ultimately discharges to "surface waters of the state."

The March 16, 2009 storm water pollution prevention plan (SWP3) does not provide the bag house dust as a potential pollutant source (PPS). The SWP3 must be revised to include bag house dust as a PPS and the BMPs that will be implemented to minimize or eliminate the potential for pollutants to discharge to "surface waters of the state." Ohio EPA recommends storing the PLCB under roof and increasing the sweeping frequency serving the area around the bag house.

Containment Plugs

The containment plugs serving the secondary containment systems of the off-road diesel tank and the bulk resin unloading station must be installed correctly to minimize or eliminate the potential discharge of pollutants to "surface waters of the state." Storm water collected within the secondary containment systems serving the off-road diesel

Mr. Patrick Davin
CW Ohio, Inc.
March 30, 2011
Page 2

tank and the bulk resin unloading station may be released upon documentation (i.e. visual inspection, analytical testing, etc.) that any storm water collected within the secondary containment systems is not contaminated. The documentation must be recorded and maintained as part of the monthly safety audits that are performed. Currently, in the event of a tank rupture, the discharge of potential pollutants would occur to "surface waters of the state."

Off-Road Diesel Tank

In the event that diesel is spilled at the off-road diesel tank, a spill kit must be installed to minimize or eliminate the potential discharge of pollutants to "surface waters of the state."

Annual Employee Training

Ohio EPA recommends that all employees that attend the annual training event sign their signature on an attendee register that will be utilized as documentation that the annual training is occurring in accordance with the General Storm Water Permit.

Solid Waste Management

Solid waste must be managed properly. A pile of saw dust had been placed in a location that drains directly into a storm sewer inlet, which discharges to "surface waters of the state" (Figure 3). The solid waste must be properly managed and disposed. Ohio EPA recommends placing the saw dust into a covered dumpster to minimize or eliminate the potential discharge of pollutants to "surface waters of the state."

The facility's SWP3 must be revised to address the above deficiencies. A written report must be submitted to Ohio EPA that details the corrective actions that have been implemented or will be implemented to address the deficiencies. In addition, a copy of the revised SWP3 must also be submitted. The written report and SWP3 must be submitted to Ohio EPA by April 29, 2011. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via email chris.moody@epa.state.oh.us.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt



Figure 1 - Bag house dust is collected in a PLCB prior to disposal and stored outdoors uncovered.



Figure 2 - Windblown particulate matter from the PLCB is deposited on the ground and tracked by vehicles into the storm sewer system.



Figure 3 - A pile of saw dust had been placed in a location that drains directly into a storm sewer inlet, which discharges to "surface waters of the state."