



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 29, 2010

RE: Medina County
D & R Industries Inc.
NPDES Permit No. OHR000004
Ohio EPA Permit Nos. 3GR00830*DG
and 3GR00120*DG
Industrial Storm Water Inspection

Ms. Laura Sylvester, Safety Coordinator
D & R Industries, Inc.
901 Seville Road
Wadsworth, OH 44281

Dear Ms. Sylvester:

On September 22, 2010, Ohio EPA conducted an inspection of D & R Industries Inc. Plant 1, located at 901 Seville Road, City of Wadsworth, Medina County (Plant 1), and Excell Polishing & Buffing, located at 9774 Trease Road, City of Wadsworth, Medina County (Plant 2). During the inspection, I was accompanied by you and Mr. David Borkowski, Jr., Plant Manager. Ohio EPA records indicate that Plant 1 and Plant 2 are covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit Nos. 3GR00830*DG and 3GR00120*DG, respectively.

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:"

Plant 1

- Part IV.D.2.a.1 of the General Storm Water Permit requires the storm water pollution prevention plan (SWP3) to include a site map that depicts the locations that are used where wastes are stored. The 55-gallon drum storage area located on the east side of Plant 1 has not been depicted (Figure 1);
- Part IV.D.3 of the General Storm Water Permit requires good housekeeping and spill prevention and response procedures to be established for all identified potential sources of pollutants at the Plant 1. The 55-gallon drum storage area currently does not have any best management practices (BMP) implemented to prevent the offsite discharge of pollutants from precipitation events (Figure 1);

- Part IV.D.3 of the General Storm Water Permit requires good housekeeping and spill prevention and response procedures to be established for all identified potential sources of pollutants at the Plant 1. Many 55-gallon drums located in the 55-gallon drum storage area contain residual materials that are exposed to precipitation events. Wastewater is generated within the 55-gallon drums (Figure 2). BMPs must be implemented to minimize or eliminate the potential to discharge wastewater from the 55-gallon drum storage area;
- The roll-off container has been lined to prevent the discharge of potential pollutants. Ohio EPA recommends that the roll-off container be covered due to the current condition and potential for pollutants to leak out of the roll-off container. In addition, spilled waste materials were documented around the roll-off container. BMPs must be implemented to address spilled waste materials to minimize or eliminate the potential discharge of pollutants (Figure 3);
- The temporary material storage area located on the south side of Plant 1 is swept via employees on second shift. Sweeping should occur more frequently or additional BMPs be implemented to reduce or eliminate the tracking of pollutants into the temporary material storage area (Figure 4); and
- Storm water runoff that is collected within the truck dock is periodically pumped to the storm sewer system (Figure 5). The General Storm Water Permit does not authorize the discharge of pollutants mixed with storm water from locations where BMPs have not been implemented. Appropriate BMPs would consist of utilizing storm drain plugs during loading and off-loading of trucks, sweeping of the truck dock, etc. Sediment deposition was observed in the truck dock that must be removed;

Plant 2

- The SWP3 details that Barbara Hatala is a member of the Plant 2 pollution prevention team; however, Ms. Hatala is no longer employed with D & R Industries Inc; and
- Part IV.D.3 of the General Storm Water Permit requires good housekeeping and spill prevention and response procedures to be established for all identified potential sources of pollutants at the Plant 1. A 55-gallon drum located on the north side of Plant 2 is uncovered and contains residual materials that are exposed to precipitation events (Figure 6). Wastewater is generated within the drums. BMPs must be implemented to minimize or eliminate the potential to discharge wastewater.

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- Part IV.D.3.b of the General Storm Water Permit requires preventative maintenance to be implemented that includes inspections and maintenance of storm water management devices. Appropriate BMPs would consist of utilizing storm drain plugs during loading and off-loading of trucks, sweeping of the truck dock, etc. Sediment deposition was observed in the truck dock that must be removed (Figure 7);

Within thirty (30) days of receiving this inspection letter, written correspondence must be received detailing the BMPs that have been implemented to address the above deficiencies. The SWP3s for Plant 1 and Plant 2 must be revised to include the BMPs that address the above deficiencies. Copies of the revised SWP3s must be submitted to Ohio EPA for review within thirty (30) days of receiving this inspection letter. 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.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt



Figure 1 - The 55-gallon drum storage area currently does not have BMPs implemented to prevent the offsite discharge of pollutants from precipitation events.



Figure 2 - Wastewater is generated within the 55-gallon drums.

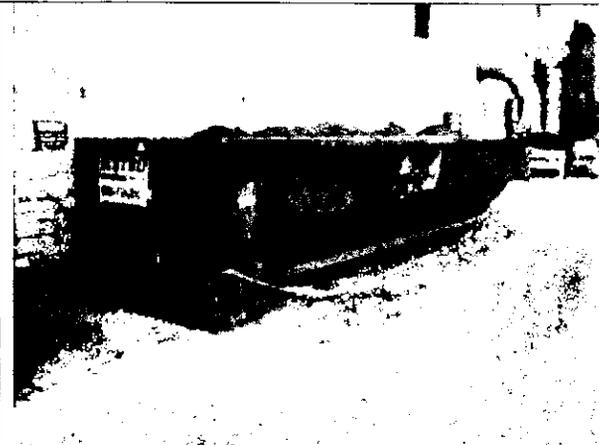


Figure 3 - BMPs must be implemented to address spilled waste materials to minimize or eliminate the potential discharge of pollutants.

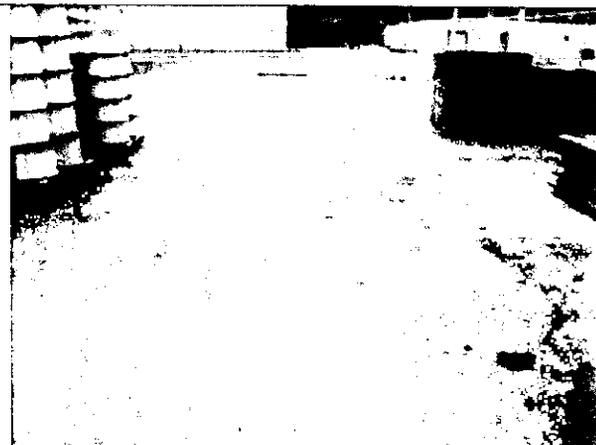


Figure 4 - Sweeping should occur more frequently or additional BMPs be implemented to reduce or eliminate the tracking of pollutants into the temporary material storage area.



Figure 5 - Storm water runoff that is collected within the truck dock is periodically pumped to the storm sewer system. Sediment deposition was also observed in the truck dock that must be removed.



Figure 6 - A 55-gallon drum located on the north side of Plant 2 is uncovered and contains residual materials that are exposed to precipitation events.



Figure 7 - Sediment deposition was observed in the truck dock that must be removed.