



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

August 19, 2009

RE: EARTH-N-WOOD PRODUCTS INC
3GR00963*DG
STORMWATER
STARK COUNTY

Craig Snee
Earth-N-Wood Products Inc
5335 Strausser Street
North Canton, Ohio 44720

Dear Mr. Snee:

On August 11, 2009, this writer conducted an inspection of your facility located at 5335 Strausser St in North Canton to determine compliance with your Industrial Storm Water NPDES permit. Along with my observation from the inspection, I have provided comments concerning the Storm Water NPDES permit below:

General:

1. Two main operations occur at this site; composting and storage yard/store.
2. The drainage from the compost yard is split into two areas. The west composting area flows into a storm drain then to the retention pond at the south side of the property. The east composting area flows into a small ditch the south of the composting piles. This ditch then flows through a pipe under a road and into a field/ retention pond.
3. The yard drainage flows into catch basins and then into the retention pond at south of property.
4. The maintenance area had a catch basin located directly under where most of the equipment maintenance is done. The area also had a large amount of material stored outside, this includes car batteries, oil drums and chemical bins.
5. The outlet of the retention pond flows into a stream that runs along the south side of the property.

Inspection Observations:

1. The diesel fuel pump located on the south side of the property had no spill response kit (oil dry, kitty litter, etc.) near. If a spill or leak occurred in this area, it would be difficult to contain the fuel before it flowed into the storm drain near the maintenance garage.
2. Oil drums and batteries need to be stored under cover to insure that no pollutants are getting picked up when it rains.

3. Leachate is getting into the retention pond causing eutrophication and large blooms of algae in the pond. The leachate has to be treated before being discharged, either by sending it to sanitary lines, containing the leachate separately and letting it evaporate completely or treating it via an onsite treatment system.
4. The ditch that collects leachate from the east compost facility was overflowing at the time of inspection. This leachate is getting discharged into a field/ retention pond.
5. Catch basins were clogged with dirt forcing water to bypass the catch basin and flow off site without settling out the sediment.

Permit:

1. A Storm Water Pollution Prevention Plan (SWPPP or SWP3) needs to be created for the Storm Water NPDES permit. The following link to the USEPA website provides guidance on preparing a SWPPP.
http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf
2. The plan should contain a site map that shows the full site including contours of the site, direction of flow for storm water, the location of outflows, location of possible contaminations to storm water, location of all surface water bodies, and any Best Management Practices (BMPs) that are currently in place.
3. Annual sampling is required at your facility. Please keep all records of monitoring info, copies of reports, sampling data, etc..., for at least 6 years from the date of origination as required in Part VI, C of the permit. These records should be kept on site as an appendix to the SWPPP.
4. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.

Action Items

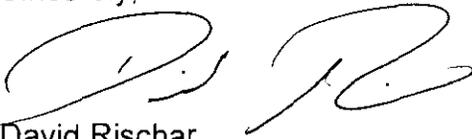
- For compliance under your NPDES General Storm Water Permit, you must collect and treat the leachate from your composting piles. You must install or implement a treatment system for the leachate either by sending it to a WWTP (with their knowledge and permission), build a treatment system for your leachate or collect the leachate and let it evaporate till it is dry. For more information about leachate from composting facilities, see pages 65-68 in the following PDF.
<http://www.epa.gov/waste/conserv/rrr/composting/pubs/cytmsw.pdf>
- Clean out catch basins and unclog pipes leading to the retention pond.
- Close off the catch basin located directly in front of the maintenance garage so that oil and other fluids from working on equipment can't get into the drain and flow to the retention pond.

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- Move batteries and oil drums under cover and label drums clearly as to what is contained inside the drum
- Place spill kits (oil dry, absorbent pads, etc.) near all above ground storage tanks.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1128 or Phil Rhodes at (330) 963-1136.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. R.', with a large, stylized flourish extending from the end of the second letter.

David Rischar
Assistant to the District Engineer
Division of Surface Water

DR:bo

File: Stormwater



Figure 1: Leachate collection ditch for the east composting piles

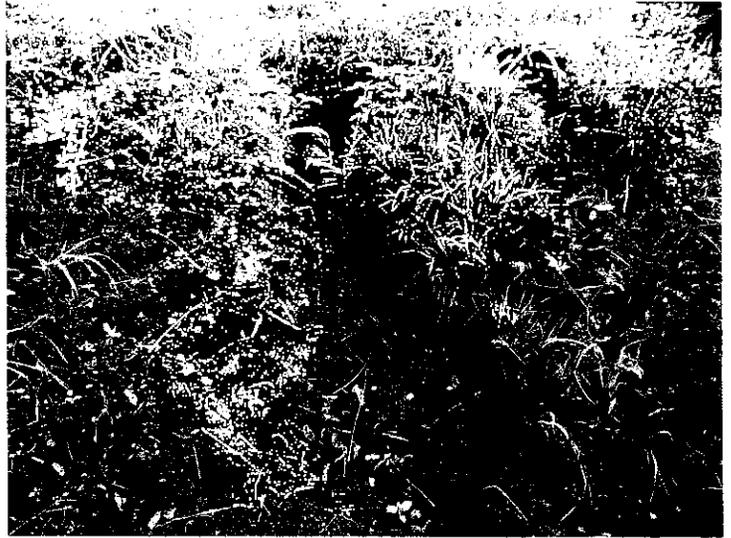


Figure 2: Pipe leading from leachate collection ditch to field/ retention pond



Figure 3: Clogged catch basin at southwest corner of storage yard



Figure 4: Clogged drain at center of the property near the maintenance garage



Figure 5: Outlet of the retention pond with excessive amounts of algae from leachate



Figure 6: Overflow channel for the retention pond



Figure 7: Battery and oil stored outside and with no secondary containment



Figure 8: Waste oil tank and kerosene tank with no secondary containment and no spill kit nearby