

**Environmental  
Protection Agency**

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

October 18, 2010

RE: MEDINA COUNTY  
EBNER FURNACES, INC.  
NPDES PERMIT NO. OHR000004  
OHIO EPA PERMIT NO. 3GR00029\*DG  
INDUSTRIAL STORM WATER INSPECTION

Mr. James O'Brien  
Vice President of Operations  
Ebner Furnaces, Inc.  
224 Quadral Drive  
Wadsworth, OH 44281

Dear Mr. O'Brien:

On October 13, 2010, Ohio EPA conducted an inspection of Ebner Furnaces, Inc., located at 224 Quadral Drive, City of Wadsworth, Medina County (facility). During the inspection, I was accompanied by you. 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. 3GR00029\*DG.

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:"

- A copy of the facility's storm water pollution prevention plan (SWP3) was unavailable during the inspection; however, on October 14, 2010 you e-mailed a copy of the facility's SWP3. The facility's storm water pollution prevention plan (SWP3) has not been updated since October 2000 and, according to your e-mail "requires to be re-written based on current conditions." Part IV.C of the General Storm Water Permit details when an SWP3 must be revised. Part IV.D of the General Storm Water Permit establishes the requirements that must be incorporated into the SWP3. The facility's SWP3 must be revised to include all of the required General Storm Water Permit components. U.S. EPA has developed a SWP3 template for facilities that engage in industrial activities. For your convenience, U.S. EPA's SWP3 template can be obtained from the following Web site:

[http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008\\_swppp](http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp)

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- Part IV of the General Storm Water Permit requires the facility to implement the SWP3. Many of the best management practices (BMP) detailed by the SWP3 to be implemented by January 2001 have not been completed. The following BMPs have not been implemented:
  - i. Outdoor storage operations – All carbon steel will be covered in some manner (Figure 1); and
  - ii. Outdoor disposal operations – There will be a stainless steel pan placed under the hopper to catch any oil discharge (Figures 2 to 3).
- Part IV.D.4 of the General Storm Water Permit requires an annual comprehensive site compliance evaluation to be performed. Records documenting that the annual comprehensive site compliance evaluation is being performed were not available.

Within thirty (30) days of receiving this inspection letter, written correspondence detailing the BMPs detailed within the SWP3 have been implemented must be received. In addition, the SWP3 must be revised to be reflective of "current conditions," in accordance with October 14, 2010 e-mail. 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](mailto:chris.moody@epa.state.oh.us).

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/mt



**Figure 1** - All carbon steel will be covered in some manner.



**Figure 2** - Discharge of pollutants from the hoppers was occurring.



**Figure 3** - BMPs have not been implemented to address pollutants from the hoppers.