



Environmental
Protection Agency

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

June 30, 2011

RE: ELYRIA PLATING CORP
3GR01241*DG
STORMWATER
LORAIN

NOTICE OF VIOLATION

Mr. Eric Manuel
Elyria Plating Corporation
118 Olive Street
Elyria, OH 44035

Dear Mr. Manuel:

On June 23, 2011 this writer conducted an inspection of your facility, located at 118 Olive Street, Elyria, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity #OHR000004 referenced above.

Storm Water Pollution Prevention Plan (SWPPP)

During my inspection, it was noted that this facility has not developed an SWPPP. **Please note that this is a violation of the NPDES permit.** Part IV.A.2 of the NPDES permit required you to create an SWPPP within 180 days of the initial submittal of a Notice of Intent (NOI) application.

Failure to comply with the NPDES permit is a violation of Ohio Revised Code (ORC) 6111.04. Violations of ORC 6111 are punishable by fines of up to \$25,000 per day of violation. Elyria Plating Corporation will remain in violation of ORC 6111 until an SWPPP is developed and submitted to Ohio EPA.

Guidance on developing the SWPPP is available from USEPA at the following website:

http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp

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 contaminants to storm water, location of all surface water bodies, and any best management practices (BMPs) that are currently in place or that must be implemented to address pollutant sources. The plan should also specify annual storm water training dates and verification that training was conducted with the employees.

In addition to noting this violation, I provide the following comments concerning your site and observations made during site inspection:

General:

1. This site is the location of Elyria Plating Corporation, a company specializing in rack and barrel plating as well as metal finishing.

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2. Storm water on site empties into a ditch on the south side of the facility.
3. During this inspection interest was expressed in acquiring a No Exposure Certification. More information on this topic and the requirements to qualify for the certification can be found via the following web link:

http://www.epa.ohio.gov/dsw/storm/stormform.aspx#no_exposure_certification

Inspection Observations:

1. At the time of inspection the general trash dumpster was uncovered and exposed while a roofed area was being constructed at its future location. Until the roofed area is complete and the dumpster is relocated there, it should be covered by a lid or tarp to prevent the collection of stormwater and the formation of leachates.
2. The dumpster containing the filter cake material was fully lined and covered; however, some staining appeared around the dumpster. I would recommend that the pavement in this area be cleaned and monitored regularly to ensure that no leaks are occurring. Good housekeeping measures must be taken to clean up leaks and spills that may occur on occasion.

Action Items

- Cover general trash dumpster.
- Monitor filter cake dumpster to ensure no leaks are occurring.
- Create an SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above, along with a copy of your newly created SWPPP. Please provide me with a letter of response no later than July 29, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email at kelly.mcvay@epa.ohio.gov.

Sincerely,



Kelly A. McVay
Assistant to the District Engineer
Division of Surface Water

KAM/mt

cc: Mukund Moghe, Engineer and Storm Water Program Coordinator, City of Elyria
Terry Korzan, Superintendent, City of Elyria Wastewater Treatment Plant