



**Environmental
Protection Agency**

Ted S. Strickland, Governor
Lee Fisher, Lt. Governor
Chris Grady, Director

June 14, 2010

RE: ERICO
3GR01035*DG
STORMWATER
CUYAHOGA COUNTY

Ms. Amy Lucia
ERICO International Corporation
34600 Solon Rd
Solon, OH 44139

Dear Ms. Lucia:

On June 1, 2010 this writer conducted an inspection of your facility, located at 34600 Solon Rd in Solon, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Paul Moentmann, Director of Manufacturing Worldwide and Lindsey Olmstead, Ohio EPA Assistant to the District Engineer were also present during this inspection. Along with our observations from the inspection we have provided comments concerning your Stormwater Pollution Prevention Plan (SWPPP) below:

General:

1. This site is manufacturer of CADWELD welding material and related grounding products.
2. Stormwater from the site is collected and discharged through two (2) outfalls. Outfall 001 is from the pond located in the northeast corner of the property. This outfall's drainage area consists of the main facility, the loading dock area and the rear parking lots. Outfall 002 is from a vegetated ditch located in the southeast corner of the property. This outfall's drainage area consists of the front parking lot areas.
3. In a letter dated July 17, 2007 Dan Bogoevski, District Engineer Ohio EPA, noted several violations occurring at this site. This inspection was a follow up to his June 5, 2007 inspection.

Inspection Observations:

1. The dumpsters containing the scrap metal were still leaking a small amount of oil. Even though the dumpster was covered and watertight, oil was still getting out of the dumpster and staining the ground. Better housekeeping and utilization of oil absorbent material around the dumpsters should keep the oil from impacting stormwater. In section 3.4 (Potential Pollution Sources) of the SWPPP, it mentions the plan to build a three sided building to store the dumpsters and the pallets. This would be the best way to keep the oil from the turnings from coming into contact with any storm water.

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2. The graphite bag house area had a large amount of dust on the concrete pad. In the notice of violation letter dated July 17, 2007, Dan Bogoevski noted the same problem and suggested that you research and implement a better way to handle the storm water getting into the trench drains and conveying the graphite dust into the nearby stream.

Action Items

- Cover and seal the dumpsters on site and clean up the oil and metal in the dumpster area.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 487-1708 or by email david.rischar@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Rischar', with a large, sweeping flourish at the end.

David Rischar
Assistant to the District Engineer
Division of Surface Water

DR/mt