

**Environmental  
Protection Agency**

Commissioner, Governor  
Deputy Commissioner, Lt. Governor  
District Director, Director

May 27, 2010

RE: FERRO CORPORATION  
3GR00401\*DG  
STORMWATER  
CUYAHOGA COUNTY

Ms. Lisa Wagoner  
Ferro Corporation  
4150 East 56<sup>th</sup> St  
Cleveland, OH 44150

Dear Ms. Wagoner:

On May 26, 2010 this writer conducted an inspection of your facility, located at 4150 East 56<sup>th</sup> St in Cleveland, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Along with my observations from the inspection I have provided comments concerning your SWPPP below:

Inspection Observations:

1. While walking around the main processing area we noticed a few areas of concern. The main area of concern is the empty barrel storage area. This area needs to be kept clean of any residual powder at all times. While not required, it is suggested that this area be roofed or under some sort of cover (tarps) to keep any residual powder from coming into contact with stormwater.
2. Catch basins on the property need to be cleaned out periodically so that there is room for future sediment to settle out of the storm water.

Permit:

1. Include on the cover page your NPDES permit number and your SIC code.
2. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees. This information can be added as an appendix to the plan.
3. Monthly inspections should be conducted. Records of the inspections should be maintained in the SWPPP.
4. The SWPPP needs to be updated to include current staff members that will be part of the Pollution Prevention Team.
5. The site map needs to be updated and necessary changes need to be made.
  - a. Identify and locate on the map all stormwater outfall location points with designated number (e.g. 001, 002, etc.).
  - b. Overall drainage patterns (which areas drain into each outfall).

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- c. Location of all storm sewers and sanitary sewers with direction of flow, including where all catch basins drain.
- d. Location of potential sources of pollutants such as tank farms, raw material storage, waste material storage, dumpsters, loading/unloading docks, air pollution control equipment (e.g. bag houses, exhaust fans). List to included any outside sources whether isolated or not.
- e. Potential sources of pollutants clearly identified on plan or by use of key.
- f. Site acreage with estimate of impervious surface vs. pervious surface.

Action Items

- Update your SWPPP.
- Determine where all catch basins drain.
- Clean out all catch basins.

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](mailto:david.rischar@epa.state.oh.us).

Sincerely,



David Rischar  
Assistant to the District Engineer  
Division of Surface Water

DR/mt



Figure 1: Example dust collector showing residual powder