Ohio | Environmental Protection Agency

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

June 20, 2011

RE: KOKOSING MATERIALS PLANT 519
PERMIT# 3GR01082*DG
INDUSTRIAL STORMWATER
CUYAHOGA COUNTY

Mr. Pat Meisner
Facility Manager
Kokosing Materials, Inc.
13700 McCracken Road
Garfield Heights, OH 44125

Dear Mr. Meisner:

On June 8, 2011 this writer conducted an inspection of your facility, located at 13700 McCracken Road, Garfield Heights, Ohio to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) permit referenced above. I was accompanied by Dan Bogoevski of our Division of Surface Water and you during this inspection. Along with our observations from the inspection we have provided comments concerning your permit below:

General:

1. This site is the location of Kokosing Materials Plant 519, a plant which manufactures asphalt and conducts fueling and maintenance activities.
2. The storm water on the site drains towards a gravel ditch and storm sewer system parallel to the railroad tracks on the east side and into a containment pit on the northwest side. Runoff which accumulates in the containment pit is pumped out into a swale along I-480. These drainage systems discharge to Mill Creek, a tributary of the Cuyahoga River.

Inspection Observations:

1. While it appears that much of the eastern drainage area infiltrates into the ballast along the railroad tracks, we did observe a storm sewer system and an accumulation of sediment around a catch basin under the I-480 Bridge (see Figure 1). We discussed best management practices to reduce the amount of sediment which can migrate to this catch basin. BMPs include, but are not limited to: more frequent sweeping of paved areas, vegetative or rock rip-rap stabilization of the disturbed area under the I-480 Bridge, installation of storm drain inlet protection or silt fence.

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2. It was observed that release agent was still dripping from the sprayers at the truck scale after a truck had completed its pass underneath, resulting in the release of this pollutant to the cement below (Figure 2). We were told this area is pressure washed on occasion. This area should not be pressure washed as this creates wastewater. Absorbent materials should be used to clean up spills and then be disposed of properly. The pavement can then be cleaned with the vacuum street sweeper. The spray nozzles for the release agent or sensors may need to be replaced to ensure that the nozzles completely shut off once a truck pulls away.
3. The dike around the asphalt tanks needs repair. It had large cracks and there was evidence that leaks have occurred (Figure 7).
4. A trailer containing automotive fluids on the south side of the Maintenance Building appeared to be leaking. Spills from this trailer can enter the storm drain a few feet away (Figure 3). This trailer should be inspected regularly and measures taken to clean up spills if they occur. Containers within the trailer that are leaking should be kept on containment trays.
5. Several 55-gallon drums are stored on the south side of the maintenance building (Figure 4). Although most of these drums are stored on a containment tray, two full drums were not. These should be moved onto the containment tray or stored inside.
6. Some scrap automotive parts are stored on the south west side of the facility (Figure 5). Some of these parts are greasy and should not be exposed to storm water. Either store these parts inside or off the ground and under the cover of a roof or tarp.
7. A more prominent sign should be displayed in the fuel area indicating the location of the emergency shut off valve.
8. As discussed, ensure that proper methods are used to dewater the containment pit. Options include, but are not limited to: (1) creating a sump pit with perforated riser wrapped in geotextile within which the pump intake hose can be placed to draw water from the pit, (2) using a dewatering bag designed to retain sediment, (3) creating a sediment basin with a skimmer outlet that connects to subsequent drainage systems rather than a containment pit, or (4) ensuring that runoff within the containment pit is quiescent for at least 24 hours to allow sediment to settle in place before it is pumped out. If this last option is chosen (which appears to be the current method being used), the pump intake hose must be floated on top to draw the cleaner water and care must be taken once water is pumped down to ensure that sediment is not discharged.
9. There were about 20 buckets of Epoxy on the north side of the facility which should be stored inside (Figure 6).

10. We observed some evidence of spillage outside the containment dike around the tack storage tank. Please reinforce good housekeeping measures with staff and contractors that draw material from or deliver material to this tank.

Storm Water Pollution Prevention Plan (SWPPP):

1. It appears that Mr. Meisner and Steve Sargeant, plant operator for Kokosing, both have responsibilities for implementing the SWPPP but are not listed as members of the Storm Water Pollution Prevention Team. Please update the SWPPP as appropriate.
2. The map should be updated with the following information:
    a. Identification of all stormwater outfall location points with designated numbers (e.g. 001, 002, etc.).
    b. The storm sewer drainage system along the railroad tracks.
    c. Location of the 2 storm drains seen or the north and south sides of the Maintenance Building along with the sewer lines which they are connected to.
    d. Identification of all storm water control structures such as the containment pit.
3. Employee training must be conducted at least once per year as required in Paragraph D.7.b.9 in Part IV of the permit. Records of scheduled training dates, topics covered, and attendance should be added as an appendix to the SWPPP and kept for no less than 6 years.
4. Sediment control measures must be included in the SWPPP as required in Paragraph D.3.h in Part IV of the permit. The SWPPP does not currently provide a description of the containment pit or the proper techniques to dewater it. In addition, the plan does not contain seeding specifications for vegetative stabilization or details for the installation of silt fence, storm drain inlet protection or other sediment and erosion controls that may be appropriate for this site. Specifications for erosion and sediment controls can be found in Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection on the Ohio Department of Natural Resources website at http://www.dnr.state.oh.us/tabid/9186/default.aspx.

Action Items

- Implement sediment control procedures and better housekeeping measures on east side of facility.
- Prevent leakage of release agent near truck scale and clean up any spills using absorbent materials.
- Prevent trailer on south side of maintenance building from leaking fluids.

- Move any full drums onto containment trays or indoors.
- Store any greasy automotive parts inside or off ground and under cover.
- Move Epoxy buckets and any other rusted buckets indoors.
- Place a sign in the fueling area indicating where the shut off valve is located.
- Repair containment dike around asphalt tanks.
- Make aforementioned changes to 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. Please provide me with a letter of response no later than July 10, 2011.

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

Sincerely,

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

KAM/mt

cc: Ralph Kyanko, Kokosing Materials Inc.

Figure 1: Storm drain covered with sediments and debris

Figure 2a: Release agent splattered on ground after truck pass

Figure 2b: Release agent station dripping after truck pass was completed

Figure 3: Trailer with signs of oil leakage

Figure 4: Two drums located off of containment tray

Figure 5: Greasy part sitting outside

Figure 6: Buckets of Epoxy exposed

Figure 7: One of the cracks in the asphalt tank dike