



Environmental
Protection Agency

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

June 2, 2011

RE: NEW YORK FROZEN FOODS
3GR01017*DG
STORMWATER
CUYAHOGA COUNTY

Mr. Michael Mahon
T. Marzetti Company
25900 Fargo Ave
Bedford Heights, OH 44146

Dear Mr. Mahon:

On May 31, 2011 this writer conducted an inspection of your facility, located at 25900 Fargo Ave, Bedford Heights, Ohio 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 permit below:

General:

1. This site is the location of New York Frozen Foods, a subsidiary of the T. Marzetti Company. The company manufactures frozen foods.
2. The storm water on the site empties into storm sewers located on paved areas around the building.
3. All storm drains had filter inserts except for drains located near the truck docking area.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. On the northeast side of the building where flour is delivered some oil sheen was observed on a puddle where loading occurs and flour was spilled on the ground. It is preferred that loading and unloading activities are done under cover of a roof, however, when not covered a drip pan should be used to catch any oil spills from the truck or spilled flour during transfer. Spilled matter should be swept up and disposed of properly immediately.
2. A small dumpster was located near the northeast corner of the building. This dumpster should be kept either with a closed lid, a tarp, or some other type of covering to keep water out and prevent leaching when not in use.
3. On the west side of the building there were some storm drains located near the truck loading area which were left unprotected. These drains should have a filter put in them as well in case of a spill.

4. On the west side of the building some cloudy red colored water was seen near the northernmost dumpster. A storm drain was located a few feet away and staining indicated some of this water had entered the storm sewer. The source of this water should be traced and replaced or removed, whether it is the dumpster or the rusted metals on the building around the dumpster area. Should preventative measures not be taken, the drain should be plugged to prevent contamination.

Permit:

1. A map of the facility must be in your Storm Water Pollution Prevention Plan (SWPPP). Maps should include:
 - a. Facility plan view identifying buildings;
 - b. Identify local streams, lakes, ditches, waterways, storm sewers;
 - c. Identify all stormwater outfall location points with designated number (e.g.: 001, 002, etc.);
 - d. Overall drainage patterns;
 - e. Location of all stormsewers and sanitary sewers with direction of flow;
 - f. Location of potential sources of pollutants such as tank farms, raw materials storage, waste material storage, dumpsters, loading/unloading docks, air pollution control equipment (e.g.: bag houses, exhaust fans);
 - g. Potential sources of pollutants clearly identified on plan or by use of key;
 - h. Identify hardscape such as parking lots and landscape such as grass of other land use;
 - i. Truck and railway lines; and
 - j. Site acreage with estimate of impervious surface vs. pervious surface.
2. Under "Preventative Maintenance" a monthly checklist was mentioned in regards to inspections. These completed checklists should be kept with the SWPPP. The plan should contain annual visual inspection records and results.
3. 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.
4. The plan should include signed Non-Storm Water Discharge Certification, stating that the discharge has been tested or evaluated (not necessarily by discharge sampling but by visual inspection) for the presence of non-storm water discharges. The certification should include:
 - a. Identification of potential significant sources of non-storm water at the site.
 - b. A description of the results of any test and/or evaluation for the presence of non-storm water discharges.
 - c. The evaluation criteria of testing method used, the date of any testing and/or evaluation.
 - d. The on-site drainage points that were directly observed during the test.

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5. The following certification statement should be signed by the appropriate individual as a part of the SWPPP:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

6. If necessary, a sample SWPPP template and more information on how to construct your plan can be found on the following web page:

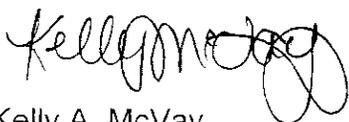
http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp

Action Items

- Clean out drain filters regularly to avoid buildup of particulate matter.
- Clean bulk flour delivery area on northeast corner. Use drip pans and good housekeeping methods to keep area clean.
- Keep all dumpsters covered.
- Place filters in drains by docking area.
- Investigate source of contaminated water near northwest dumpster and resolve issue with replacement or removal of source.

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

KM/mt

cc: Bob Hanel, T. Marzetti Company