



Environmental
Protection Agency

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

June 14, 2011

RE: NOVA CHEMICALS INC
3GR00600*DG
STORMWATER
LAKE COUNTY

Mr. Bryan Stansloski
RC Specialist
NOVA Chemicals Inc.
786 Hardy Road
Painesville, OH 44077

Dear Mr. Stansloski:

On June 13, 2011 this writer conducted an inspection of your facility, located at 786 Hardy Road, Painesville, 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 NOVA Chemicals Inc., an expandable polystyrene products manufacturing facility.
2. The storm water on the site empties into drains which lead to the Hardy Road ditch on the southwest corner of the facility.

Inspection Observations:

1. While walking around the outside of the building the only area of concern I noticed was in the maintenance area on the southwest side of the property. An older unused crane, which was stored under the roofed area, seemed to be depositing oils and other materials onto the cement which was then spreading towards the gravel out of the covered area. This area should be cleaned with all waste material disposed of properly. As discussed, the company intends to try to get rid of this machinery. However, if it must be stored on site and cannot be stored inside, it should be kept under cover and drip pans should be used to catch any leaking materials.

Permit:

1. As discussed, all storm drains on the site should be added to the facility map along with the pipe lines.

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2. Records of attendance should be kept with the Storm Water Pollution Prevention Plan (SWPPP) for employee training events.
3. Comprehensive site evaluations should be completed at least once a year and documented in the SWPPP as required in Paragraph D.4 of Part IV of the permit.
4. Visual inspections should be carried out and documented in intervals specified in the SWPPP as required in Paragraph D.3.d of Part IV of the permit.
5. The Non-Storm Water Discharges certification should be a signed certification stating that the discharge has been tested or evaluated (does not necessarily require discharge sampling) for the presence of non-storm water discharges. The certification shall include:
 - a. The 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 or testing methods used, the date of any testing and/or evaluation.
 - d. The on-site drainage points that were directly observed during the test.
6. Updated portions of the SWPPP should be added into the binder and the old portions that are replaced should be taken out and stored separately.

Action Items

- Clean oil and waste matter deposited by crane in maintenance area.
- Make aforementioned changes to SWPPP.

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