



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Koneski, Director

June 7, 2010

RE: SCOT LABORATORIES
3GR00032*DG
STORMWATER
GEAUGA COUNTY

Mr. Russ Anderson
Scot Laboratories
16841 Park Circle Drive
Chagrin Falls, OH 44023

Dear Mr. Anderson:

On June 1, 2010 this writer conducted an inspection of your facility, located at 16841 Park Circle Drive in Chagrin Falls, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. David Rischar, Ohio EPA Assistant to the District Engineer and Nandini Vembar, Quality Assurance Engineer, were also present during this inspection. Along with my observations from the inspection I have provided comments concerning your SWPPP below:

General:

1. This site is a laboratory specializing in mixing and producing chemicals, particularly cleaning solutions.
2. The storm water flows through three different underground pipes into a ditch located along the south side of the property. The ditch then drains into McFarland Creek. The flow from one of the pipes is controlled by a gate valve.
3. The wastewater generated from production inside the building is pretreated on site for pH then pumped to McFarland Creek Waste Water Treatment Plant.

Inspection Observations:

1. While walking around the outside of the building we noticed a few areas of concern. Once the chemical storage barrels are emptied, they are stored outside where the excess chemicals can come in contact with precipitation.
2. If chemicals were to mix with the storm water, the only preventative measure is the gate valve at the end of the piping system, which was left opened during the inspection. This makes it difficult to detect and prevent polluted water from flowing freely. It is recommended that a retention basin is added to prevent runoff from flowing directly into the stream.
3. A drip pan should be kept near the loading/unloading areas.

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Permit:

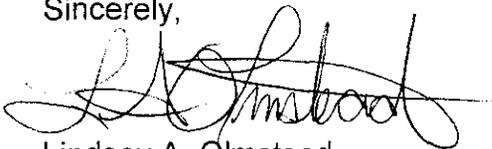
1. Finish updating the SWPPP and continue to update it as the industry makes changes.
2. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees. This information can be added as an appendix to the plan.
3. Monthly inspections should be conducted. Records of the inspections should be maintained in the SWPPP.
4. The site map needs to be updated to show the current layout of the site.

Action Items

- Update your SWPPP.
- Keep gate valve closed until water has been inspected.
- Keep drip pans next to loading/unloading areas.
- Move empty barrels to an enclosed area.
- Consider adding a retention basin.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email lindsey.olmstead@epa.state.oh.us.

Sincerely,



Lindsey A. Olmstead
Assistant to the District Engineer
Division of Surface Water

LAO/mt