



**Environmental
Protection Agency**

Ted Strouss, Governor
Lee Fisher, Lt. Governor
Chris Kortesi, Director

August 27, 2010

RE: SWAGELOK COMPANY
3GR01239*DG
INDUSTRIAL STORMWATER
CUYAHOGA COUNTY

Mr. Chris Rhodes
Environmental and Safety Manager
Swagelok Company
31500 Aurora Road
Solon, OH 44139

Dear Mr. Rhodes:

On August 19, 2010, this writer conducted an inspection of your facility located at 15400 Foltz Industrial Pkwy in Strongsville, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Along with our observations from the inspection, we have provided comments concerning your Storm Water Pollution Prevention Plan (SWPPP) below:

General:

1. This site is a manufacturer of turned products and machined components.
2. All production is done inside the building.
3. There are no floor drains in the main production areas of the plant.
4. Turnings are collected inside the building in smaller mobile containers and then dumped into larger bins by a forklift. The larger bins are stored under a roof to protect them from rain and snow.
5. Chips are dumped into watertight bins by conveyor belt. These bins are not covered and are exposed to stormwater.

Inspection Observations:

1. The areas surrounding the turnings and chip bins need to be inspected and cleaned regularly (at the beginning or the end of each shift) to assure that no oil or grease is leaking from the bins. Additionally, when a bin is changed out for a new one, you should do a preliminary inspection to assure that no holes are present and that they are in good condition.
2. The bins that contain the chips need to have a cover placed over the top to prevent exposure with stormwater.
3. The catch basin should be cleaned out regularly to allow room for new sediment to settle out of the stormwater.

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4. A spill kit should be placed next to the dock inside the building so in the event of a spill it is easily accessible.
5. In the rear of the property, there were several drums and totes being stored. These drums should be moved either under cover or into secondary containment.

Permit:

1. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.
2. The site map needs to be created and the following should be included:
 - a. Identify and locate on map all stormwater outfall location points with designated number (eg: 001, 002, etc.);
 - b. Overall drainage patterns (which areas drain into each outfall);
 - 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 (eg: bag houses, exhaust fans). List to included any outside sources whether isolated or not;
 - e. Potential sources of pollutants clearly identified on map or by use of key; and
 - f. Site acreage with estimate of impervious surface vs. pervious surface.

Action Items

- Cover the dumpsters that contain turnings and chips.
- Inspect and clean the area surrounding the turning bins.
- Place spill kit near loading dock.
- Move drums and totes under cover or into secondary containment.

If you should have any questions concerning this letter, feel free to contact Chuck Allen at (330) 963-1110 or by e-mail Chuck.Allen@epa.state.oh.us.

Sincerely,



David Rischar
Assistant to the District Engineer
Division of Surface Water

DR:bo

pc: Chuck Allen, DSW, NEDO, OEPA

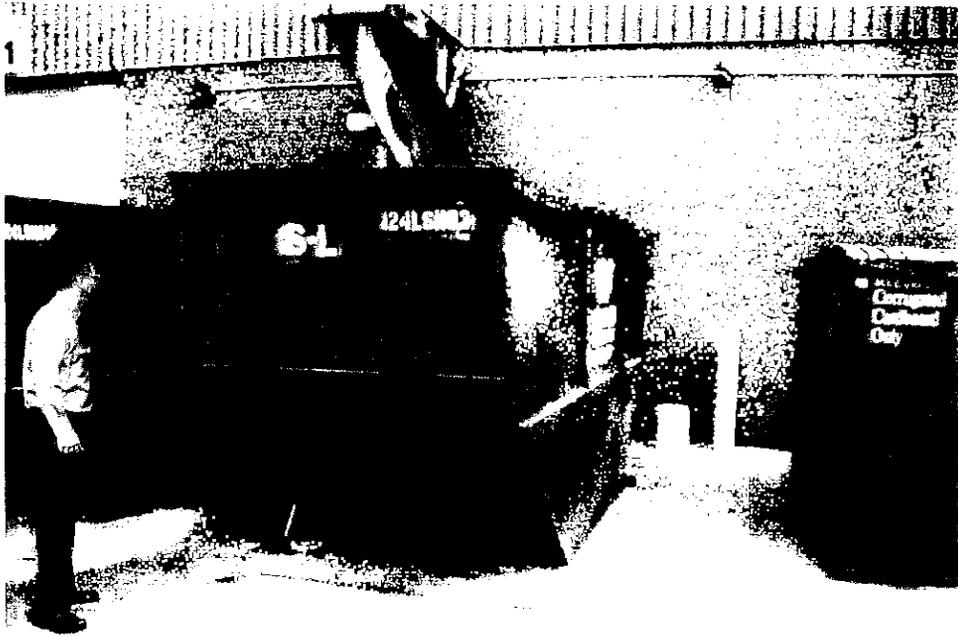


Figure 1: Chip dumpster: These dumpster need to have a cover installed to reduce exposure to stormwater, inspections of this area should be done on a regular basis to eliminate possible pollutants from entering the stormwater.



Figure 2: Area between chip dumpsters: Example of why inspections are needed for this area, oil and chips are on the ground where they can be easily transported by stormwater.



Figure 3: Turning storage area: Dumpsters containing turnings and scrap metal stored under a roof.



Figure 4: Area between two of the turning bins under the roof, this area need to be cleaned up and inspected on a regular basis.