



**Environmental
Protection Agency**

John Kasich, Governor
Ted Strickland, Lt. Governor
Chris K. Rose, Director

August 27, 2010

RE: SWAGELOK COMPANY
3GR01238*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 21693 Drake Rd 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.
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.
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.

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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.

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 – Oil and excess material built up around the base of the chip dumpsters. When a new dumpster comes in to be changed out you should conduct a preliminary inspection to assure no holes exist.



Figure 2: Chip Dumpsters – Excess material around the bottom of the chip dumpsters, this area should be inspected on a regular basis.



Figure 3: Turning Dumpsters – turning collection system using both conveyor belts as well as by forklifts with smaller hoppers.